

KINGSLEY SZAMET & LY

ERIC B. KINGSLEY, Esq. (SBN 185123)

eric@kingsleylawyers.com

LIANE KATZENSTEIN LY, Esq., (SBN 259230)

liane@kingsleylawyers.com

JESSICA BULAON, Esq. (SBN 340749)

jessi@kingsleylawyers.com

16133 Ventura Blvd., Suite 1200

Encino, CA 91436

Telephone: (818) 990-8300

Fax: (818) 990-2903

ABRAMSON LABOR GROUP

WILLIAM ZEV ABRAMSON, Esq. (SBN 289387)

Wza@abramsonlabor.com

11846 Ventura Blvd., Suite 100

Studio City, CA 91604

Tel: (213) 493-6300, Fax (213) 382-4083

Attorneys for Plaintiff and all aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA**FOR THE COUNTY OF SAN DIEGO**RONNIE WALDON, JR., an individual, on
behalf of himself and others similarly situated,

PLAINTIFF,

v.

NOBU SAN DIEGO, LLC; and DOES 1 thru
50, inclusive,

DEFENDANTS.

Case No. 37-2023-00001244-CU-OE-CTL

[Case Assigned for All Purposes to Hon.
Katherine Bacal in Dept. C-69]**SUPPLEMENTAL DECLARATION OF
RONNIE WALDON, JR. IN SUPPORT
OF PLAINTIFF'S MOTION FOR
APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

Date: June 7, 2024

Time: 11:00 AM

Dept.: C-69

Complaint Filed: January 5, 2023

Trial Date: June 14, 2024

SUPPLEMENTAL DECLARATION OF RONNIE WALDON, JR.

I, RONNIE WALDON, JR., state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant NOBU SAN DIEGO, LLC (“Defendant” or “Nobu”).

3. I brought this lawsuit, on behalf of myself and all other Aggrieved Employees, against Defendant because I believe that Defendant failed to pay all wages and/or overtime, failed to provide lawful meal and rest periods, failed to reimburse business-related expenses, failed to issue accurate itemized wage statements and failed to pay wages owed at time of separation to me and other employees.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys’ various communications regarding this matter, making myself available by phone for a full-day mediation on September 12, 2023; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Aggrieved Employees.

6. I have worked to actively represent the other Aggrieved Employees and their interests.

7. Early on this litigation, I could have chosen to put my interests ahead of the Aggrieved Employees and seek a settlement for myself only. I did not do that.

8. I have always kept the Aggrieved Employees’ interests at heart in this litigation.

9. I am prepared to continue assisting with this litigation and am committed to

1 achieving the best possible results for the Aggrieved Employees.

2 10. I believe that I have fairly represented the absent Aggrieved Employees and request
3 that the Court finally approve this settlement and confirm me as the named Plaintiff.

4 11. I have waited over a year for this Settlement, and over that year I have spent more
5 than 35 hours of my time assisting in this litigation.

6 12. It is my opinion that the settlement agreement provides for a fair and adequate
7 enhancement for me as the named Plaintiff, in the amount of \$5,000. I believe that this is fair and
8 reasonable in light of all of the work that I have performed in my role as the named Plaintiff.

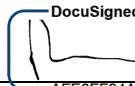
9 13. Without my decision to act as the named plaintiff, the State and the Aggrieved
10 Employees would receive nothing.

11 14. I understand that the Court is inclined to award me nothing for my work on this
12 matter. Since my employment with Defendant ended, I have become homeless, and my car was
13 repossessed. As a low wage worker who has been counting on this money, not being awarded an
14 enhancement would be a devastating consequence for me.

15
16
17 I declare under penalty of perjury under the laws of the State of California that the foregoing
18 is true and correct.

19 Executed this ²² day of May, 2024 at San Diego, California.

20
21 DocuSigned by:



22 _____
23 RONNIE WALDON JR.
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(PROOF OF SERVICE)**[CCP 1013(a)(3)]****STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On May 28, 2024, I served all interested parties in this action the following documents described as: **SUPPLEMENTAL DECLARATION OF RONNIE WALDON JR. IN SUPPORT OF MOTION FOR REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Kevin S. Wattles

kwattles@slfesq.com

Rachael L. Marko

rmarko@slfesq.com

Linda Abernethy

labernethy@slfesq.com

SOLTMAN, LEVITT, FLAHERTY & WATTLES LLP

90 E. Thousand Oaks Blvd., Suite 300

Thousand Oaks, CA 91360

Attorneys for Defendant

ABRAMSON LABOR GROUP

William Zev Abramson

Wza@abramsonlabor.com

11846 Ventura Blvd., Suite 100

Studio City, CA 91604

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 28, 2024, at Woodland Hills, California.



Michelle Tanzer