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Attorneys for Plaintiff and the 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 other 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]

**DECLARATION OF RONNIE WALDON
IN SUPPORT OF MOTION FOR
REPRESENTATIVE ACTION
SETTLEMENT**

Date: May 10, 2024
Time: 11:00 AM
Dept: C-69

Complaint Filed: January 5, 2023
Trial Date: June 14, 2024

Reservation No. 3059300

DECLARATION OF RONNIE WALDON

I, RONNIE WALDON, 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. I first researched experienced attorneys who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed on January 5, 2023.

6. 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 in 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.

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

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

2 9. I am prepared to continue assisting with this litigation and am committed to
3 achieving the best possible results for the Aggrieved Employees.

4 10. I believe that the representative action settlement obtained on behalf of the
5 Aggrieved Employees is fair and reasonable in light of the issues involved in this case. As
6 mentioned above, I reviewed and discussed the Agreement with my attorneys and asked them
7 questions about it to ensure that I understood its terms and what it would mean for all of the
8 Aggrieved Employees.

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

11 12. I am not aware of any conflicts of interest that prevent me from being confirmed as
12 the named Plaintiff in this action. I am not related in any way to my attorneys or to any other
13 member of the firm that is representing me. I have no business dealings or other involvement
14 beyond this lawsuit and this representation. I have not been promised any money or inducement
15 to serve as the named Plaintiff in this action.

16 13. It is my opinion that the settlement agreement provides for a fair and adequate
17 enhancement for me as the named Plaintiff, in the amount of \$5,000. I believe that this is fair and
18 reasonable in light of all of the work that I have performed in my role as the named Plaintiff. As
19 the named Plaintiff, I have actively participated in all stages of the litigation, as detailed above,
20 and have always maintained the best interests of the Aggrieved Employees while performing my
21 named Plaintiff duties.

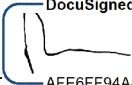
22 14. It is also my opinion that the Litigation Enhancement is fair, reasonable, and
23 adequate because, in addition to the many hours spent participating in the prosecution of this case,
24 I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we were
25 unsuccessful in this action. Likewise, I risk the potential stigma of being a named Plaintiff in a
26 representative action labor dispute, which may affect my future employability.

27 ///

28 ///

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct.

3 Executed this 27th day of November, 2023 at San Diego,
4 California.

5  DocuSigned by:
6 AFE6FF94A87F47F...
7 RONNIE WALDON

(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 November 29, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF RONNIE WALDON 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

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[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 sent 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 November 29, 2023, at Los Angeles, California.


Taylor Gregg