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Attorneys for Plaintiff Yolundria Rooks, individually,
and on behalf of all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN**

YOLUNDRIA ROOKS, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

HOT CAKES RESTAURANT GROUP, INC.
DBA DENNY'S; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: STK-CV-UOE-2022-0011056

*Consolidated with Case No. STK-CV-UOE-
2022-0008840*

*Assigned for all purposes to:
Hon. Robert T. Waters, Dept. 11B*

**DECLARATION OF YOLUNDRIA
ROOKS IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: **OCT 22 2024**
Time: 9:00 a.m.
Dept.: 11B

WILSHIRE LAW FIRM, PLC
3055 Wilshire Blvd., 12th Floor
Los Angeles, CA 90010-1137

DECLARATION OF YOLUNDRIA ROOKS IN SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

FILED BY FAX

I, Yolundria Rooks, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Hot Cakes Restaurant Group, Inc. DBA Denny's ("Denny's") as an hourly-paid, non-exempt server from around 2015 to 2018, and then again from around November 2021 to October 2022.

3. Based on my experience and knowledge of Denny's wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of Denny's.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of Denny's. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees at Denny's.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Denny's company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Denny's.

7. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and

1 information to my attorneys, keeping in regular contact with my attorneys regarding the status of
2 the case, and reviewing the settlement agreement to make sure it was fair.

3 8. I will continue to actively participate in this lawsuit as necessary, and will continue
4 to make myself available to assist in this case moving forward as needed.

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

7 Executed on September 13, 2024 at Stockton, California.

8  DocuSigned by:
Yolundria Rooks
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10 Yolundria Rooks

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