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9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**
12

13 KORY MAIDEN, as aggrieved employee
pursuant to the Private Attorneys General Act
14 (“PAGA”), on behalf of the state of California
and other non-party Aggrieved Employees,
15 Plaintiff,

16 v.

17 AMIRIAN MANAGEMENT COMPANY, a
18 California corporation; PCL VENTURES
LLC, a California limited liability company;
19 14777 BEAR VALLEY ROAD LLC, a
California limited liability company; 198 E.
20 REDLANDS BLVD. LLC, a California
limited liability company; 498 EAST 4TH ST.
21 LLC, a California limited liability company;
22 899 N LAKE AVE LLC, a California limited
liability company; and DOES 1 through 10,
23 inclusive,

24 Defendants.
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Case No. 23STCV11444

Assigned for All Purposes to:
Hon. Laura Seigle
Dept.: 17

DECLARATION OF RYSHANIQUE
QUITANAE MAE WASHINGTON

Date: July 7, 2025
Time: 9:00 a.m.
Dept.: SSC-17

DECLARATION OF RYSHANIQUE QUITANAE MAE WASHINGTON

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1 I, RYSHANIQUE QUITANAE MAE WASHINGTON, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiff's Motion for Approval of Settlement under Private Attorneys
5 General Act.

6 2. I worked for Defendants at their Popeye's Chicken restaurants as a non-exempt
7 crew member and cashier at a Los Angeles location from around February 6, 2022 through June
8 22, 2022. While worked there I don't believe I was paid correctly for all the hours I worked
9 because I had to perform work during lunch breaks and this time was not paid for even though I
10 supposedly was clock out. I also don't think I got all of my lunches and rest breaks like I was
11 supposed to, especially since I had to work during many lunch breaks. I also was constantly using
12 my own phone to be in touch with my supervisors and I never received any kind of
13 reimbursement for this.

14 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
15 employee of Defendants with regard to not being paid correctly, not getting all of my lunches and
16 breaks like I was supposed to, and not being reimbursed for using my own phone on company
17 basis.

18 4. It is my understanding this lawsuit could not have been prosecuted or settled on
19 behalf of the other employees unless I or some other current or former employee decided to serve
20 as a named plaintiff and proposed PAGA representative. In deciding to serve as a named plaintiff
21 in this case, I understood that my name could be publicly attached to this lawsuit and that my
22 work experiences to some extent would be set forth in a public court file. I recognized I would
23 need to devote a certain amount of time that I could have spent otherwise. I also recognized my
24 bringing the lawsuit carried some degree of risk for defendants' legal costs among other things.
25 Despite this, I decided to serve as the named plaintiff and PAGA rep without any promise of
26 recovery or compensation.

27 5. I am familiar with the work involved in prosecuting this case. I have participated
28 in meetings, phone calls, and other communications with my lawyers regarding this case. I am

1 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
2 events in this case, including the investigation performed by my lawyers, the mediation with
3 Defendants that eventually resulted in this settlement, and the preparation of settlement papers
4 and the need to obtain court approval of the proposed settlement. I participated in the litigation
5 and provided my lawyers with information and documents regarding my employment with
6 Defendant.

7 6. I believe that the proposed settlement obtained on behalf of the State and other
8 aggrieved employees is excellent in view of the issues and risks involved with the case.

9 7. I believe I have fulfilled my duties as a named plaintiff, which required a
10 significant amount of time and effort during the course of this case. These efforts required
11 dedicating numerous hours to lawsuit activities including, but not limited to: (a) communicating
12 with my attorneys to stay informed of ongoing developments in the case and to discuss the
13 proposed settlement ultimately negotiated; (b) searching for and providing documents and other
14 materials relating to my work experience; (c) responding to requests for information relating to
15 my work experience; and (d) reviewing filings and key documents including drafts of the
16 complaint and the settlement agreement. These tasks required my dedication of at least 25 hours
17 of my time, which time I honestly could have spent on family, personal time, or work. My
18 understanding is that future tasks may require several more hours of my time. Further, at all times
19 I was ready, willing and able to testify at deposition and/or trial. I believe I have been diligent and
20 that I have acted above and beyond that of which is expected of a named plaintiff and proposed
21 class representative to date and will continue to do so.

22 8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as the
23 named plaintiff and class representative, and in consideration for my general release of all claims
24 against Defendant. I believe that amount is fair and reasonable in view of the work I have and
25 may have to continue to perform. I believe that my role as the named plaintiff and PAGA
26 representative in this lawsuit has resulted in a valuable benefit to the State and to the other
27 employees, and I accepted the potential risk of being liable for the opposing parties' costs if we
28 were unsuccessful in this lawsuit. I believed in this case, so I was willing to be the named plaintiff

1 and class rep to risk this and pursue this representative litigation. I also accepted the risk that
2 news of this lawsuit could also potentially impact my ability to secure other work.

3 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and
4 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

5 I declare under penalty of perjury under the laws of California that the foregoing is true
6 and correct. Executed on 05 / 23 / 2025, at Los angeles, California.

7
8 *Ryshanique washington*

9 RYSHANIQUE QUITANAE MAE
10 WASHINGTON

Title	Declaration of RYSHANIQUE QUITANAE MAE WASHINGTON
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The document has been completed.