

JUSTICE FOR WORKERS, P.C.

William C. Sung, SB# 280792

E-Mail: william@justiceforworkers.com

Tiffany L. Luu, SB# 335127

E-Mail: tluu@justiceforworkers.com

3600 Wilshire Boulevard, Suite 1815

Los Angeles, CA 90010

Tel: 323-922-2000

Fax: 323-922-2000

Attorneys for Plaintiff ANNETTE DEARING

BARVIE LAW, APC

Nicole Barvie, SB#282352

Email: nicole@barvielaw.com

550 W B Street, Fourth Floor

San Diego, CA 92101

Tel: 858-255-0928

Fax: 858-357-8592

Attorneys for Plaintiff REBECCA TAYLOR

AIMAN-SMITH & MARCY

Hallie Von Rock

7677 Oakport Street, Suite 1000

Oakland, CA 94621

Tel: (510) 519-1018

hvr@asmlawyers.com

Attorney for Plaintiff JANETTE TELLO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MADERA

ANNETTE DEARING, an individual,
REBECCA TAYLOR, an individual,
JANETTE TELLO, an individual, on behalf of
themselves, and on behalf of all others
similarly situated;

Plaintiff,

vs.

LOVE'S COUNTRY STORES OF
CALIFORNIA, a California corporation; and
DOES 1 through 50,

Defendants.

Case No. MCV090813

**DECLARATION OF REBECCA TAYLOR IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

**(Filed concurrently with Motion for
preliminary Approval, Supporting
Declarations and [Proposed] Order)**

Date: February 26, 2026

Time: 8:30 a.m.

Judge: Hon. Michael J. Jurkovich

Dept.: 17

1 I, REBECCA TAYLOR, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am a named Plaintiff in the above
4 wage and hour class action filed against LOVE'S COUNTRY STORES OF CALIFORNIA (hereinafter
5 collectively "Defendant").

6 2. This declaration is being submitted in support of Plaintiffs' Unopposed Motion for
7 Preliminary Approval of Class Action and PAGA Settlement and in support of my application for the
8 requested Service Award. I have personal knowledge of all the facts stated herein. I could and would
9 competently testify under oath to these facts in court if requested to do so.

10 3. I believe that I am, have been and will continue to represent the interests of the class
11 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
12 to represent.

13 4. I worked for Defendant as an hourly-paid, non-exempt employee in California from
14 October 14, 2020 to March 14, 2022 at Defendant's location in Williams, California. At all times
15 during my employment, I earned an hourly wage and was entitled to legally compliant meal and/or
16 rest periods, and minimum, regular and overtime wages for all hours worked. Throughout my
17 employment, I was subject to Defendant's wage-and-hour policies and procedures that are at issue in
18 this case.

19 5. Generally, my lawsuit claims that Defendant failed to pay for all time worked, failed to
20 provide compliant meal and rest periods, failed to blend the regular rate of pay, failed to furnish
21 accurate itemized wage statements, and failed to reimburse for required business expenses.

22 6. As a result of Defendant's practices, I believe I did not receive all wages owed to me
23 during my employment and did not receive accurate itemized wage statements.

24 7. I believe that my claims are typical of the claims of the Class Members that I am seeking
25 to represent because I was subject to the same alleged unlawful employment policies and practices at
26 issue in this action, including but not limited to, Defendant's failure to pay for all time worked, failure
27 to provide complaint meal and rest periods, failure to furnish accurate itemized wage statements, and
28

1 failure to reimburse for required business expenses. Factually, Defendant's policies and practices
2 apply class wide, and Defendant's liability can be determined by facts common to all members of the
3 Class.

4 8. Further, there is no conflict between my interests and the interests of the class that I am
5 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
6 I was injured by the same company-wide policies and practices to which the proposed Class was
7 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
8 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the
9 proposed settlement to assure that it is fair.

10 9. I understood at the time that I filed this action, that as a Class Representative, I owed a
11 duty to the putative class members to faithfully prosecute this action with their best interests at the
12 forefront of every decision. I understood that I could not make any decision in this action for the sole
13 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
14 sacrifice my personal best interests for the benefit of the interests of the putative class members.
15 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
16 relief for my current and former co-workers for what I perceived to be Defendant's unlawful wage
17 and hour practices. I believe that I faithfully executed the duties of a Class Representative throughout
18 this litigation and will continue to do until this litigation is fully and finally resolved.

19 10. Throughout the course of this litigation (3 years and 4 months), I have remained actively
20 involved and committed to the prosecution of this case on behalf of the Class. My participation has
21 included the following: (1) I initiated contact with my attorneys to report the violations and discuss
22 the facts supporting the claims in this case; (2) I participated in multiple conference phone calls and
23 meetings with my attorneys to provide information and context regarding Defendant's wage and hour
24 practices; (3) I reviewed and approved the complaint filed in my San Bernardino matter and in this
25 matter; (4) I reviewed and approved the PAGA Notice and draft complaint filed with the LWDA; (5)
26 I assisted in identifying relevant documents and information in my possession; (6) I assisted in
27 responding to written discovery; (7) I remained available via phone, text, or email for follow-up

1 questions and clarifications throughout the litigation; (8) I provided witnesses and their proposed
2 testimony to assist in the prosecution of this matter; (9) participated in reviewing Defendant's
3 discovery responses; (10) I reviewed the mediation brief for accuracy; (11) I reviewed the terms of the
4 memorandum of understanding and the proposed settlement and discussed its fairness with counsel;
5 and (12) I have participated in the preliminary approval process by reviewing and approving my
6 declaration of preliminary approval of Class and PAGA settlement.

7 11. I estimate that I have spent over 40 hours assisting with this case over the course of the
8 litigation, which has lasted over three years since I retained counsel. This time was spent primarily
9 during evenings and weekends, when I was not working or attending to personal obligations. I took
10 these responsibilities seriously and made myself consistently available to counsel as needed to support
11 the interests of the Class.

12 12. I understand that my attorneys will request that the Court approve a service award of
13 \$10,000 for my efforts on behalf of the Class. I believe this amount is reasonable given the time and
14 effort I devoted to this case, the personal risks I accepted by servicing as Class Representative, and
15 the benefits achieved for the Class. My support for the Settlement is not contingent on receiving this
16 service award.

17 13. I believe that the proposed settlement before the Court is fair, reasonable and adequate,
18 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
19 humbly, I ask the Court to grant preliminary approval of the Settlement and all of its terms.

20 I declare under the penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed on January 2026, at Williams (City/Location), California

22
23 By: 
24 REBECCA TAYLOR