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**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;

Plaintiffs,

vs.

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

Defendants.

Case No. MCV090813

**DECLARATION OF ANNETTE
DEARING IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEY'S FEES AND COSTS, AND
SERVICE PAYMENTS**

(Filed concurrently with Motion for Final
Approval; Supporting Declarations; and
[Proposed] Judgment and Order)

Date: July 27, 2026
Time: 8:30 a.m.
Judge: Hon. Michael J. Jurkovich
Dept.: 411B

Action Filed: November 28, 2023
Trial Date: Not Set

1 I, Annette Dearing, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-captioned
3 matter. This declaration is submitted in support of approval of the proposed class action and PAGA
4 settlement (“Settlement”) reached in this case. I have personal knowledge of the facts contained in this
5 declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I was employed by Defendant Love’s County Stores of California, Inc. (“Defendant”) as
7 an hourly-paid, non-exempt employee from hourly-paid, non-exempt employee from approximately
8 December 2021 to approximately June 20, 2023 as a shift lead at its travel stop in Madera, California.
9 During my employment with Defendant, I was subject to Defendant’s wage and hour policies and
10 practices that are at issue in this case.

11 3. Specifically, I earned various types of incentive compensation, including a non-cash
12 incentive called Golden Hearts, and it is my understanding that Defendant did not properly include
13 incentives in my overtime, paid sick leave, and meal period premium rates of pay; due to operational
14 needs, I sometimes had to work off the clock without pay and was not able to take compliant meal and
15 rest periods; and I had to use my personal cellphone to perform my job duties without reimbursement.
16 As a result of the foregoing issue, I believe I received inaccurate wage statements and was not paid all
17 wages when my employment with Defendant ended. I believe other non-exempt employees of
18 Defendant were subject to the same policies and procedures discussed above and that my claims against
19 Defendant for statutory and civil penalties are typical of Class Members’ claims.

20 4. I have been actively involved in this case since I first retained Justice for Workers, P.C.
21 (“JFW”) in November 2023. Without waiving the attorney-client privilege, prior to filing this lawsuit,
22 my attorneys explained my role and responsibilities as a Class Representative, and I understand my
23 responsibilities as a Class Representative. Since retaining my attorneys, I have had many discussions
24 and meetings with the attorneys and staff at JFW, discussions regarding Defendant’s wage and hour
25 practices and my claims in this case, litigation strategy, updates on how the case was proceeding, the
26 Settlement, and how I could help the case and potential Class Members. I estimate that I have spent at
27 least 20 hours on this case from the time I first spoke with my attorneys regarding this case until the
28 present.

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

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

7. I understand that my attorneys will request that the Court approve a service award of \$10,000.00 for my efforts on behalf of the Class. I believe this amount is reasonable based on the amount of time and effort I have devoted to this case, the risks I have undertaken as a Class Representative including being sued by Defendant, and my general release of claims, as described above. My support for the Settlement is not contingent on my receiving this service award.

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

Executed on January 20, 2026 at Chowchilla, California.

Annette Dearing

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