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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;

Plaintiff,

vs.

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

Defendants.

Case No. MCV090813

**DECLARATION OF JANETTE TELLO 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, Janette Tello, hereby declare as follows:

2 1. I am an individual over the age of 18 years and a named Plaintiff in the above-captioned
3 matter. I submit this declaration in support of approval of the proposed class action and PAGA
4 settlement (“Settlement”). I have personal knowledge of the facts stated in this declaration and, if called
5 as a witness, could and would testify truthfully to them.

6 2. I was employed by Defendant Love’s Country Stores of California, Inc. (“Defendant”) as
7 an hourly-paid, non-exempt employee from approximately July 2013 through April 2024 at Defendant’s
8 location in Coachella, California. During my employment, I was subject to Defendant’s wage-and-hour
9 policies and practices that are at issue in this case.

10 3. Over the course of my employment, I worked long hours and did my best to meet the
11 demands of my job. Based on my own experience, I believe Defendant failed to properly compensate me
12 and other non-exempt employees in several important ways. For example, I believe Defendant did not
13 properly calculate the regular rate of pay for overtime and premium wages, required or allowed work to
14 be performed off the clock, failed to consistently provide compliant meal and rest periods due to
15 operational demands, issued inaccurate wage statements, and failed to reimburse necessary business
16 expenses, including requiring the use of personal cellphones for work-related purposes without
17 reimbursement.

18 4. As a result of these practices, I believe I did not receive all wages owed to me during my
19 employment and did not receive accurate itemized wage statements. Based on my conversations with
20 coworkers and what I observed during my more than ten years with Defendant, I also believe that other
21 non-exempt employees were affected by the same or similar company-wide policies and practices. My
22 claims are therefore typical of the claims asserted on behalf of the proposed Settlement Class and
23 Aggrieved Employees.

24 5. I have been actively involved in this case since I first retained Aiman-Smith & Marcy to
25 represent me. My attorneys explained my role and responsibilities as a Class Representative, and I
26 understood what that role required when I agreed to serve. Since that time, I have stayed engaged by
27 communicating regularly with my attorneys about my work experience, Defendant’s practices, litigation
28 strategy, mediation, and the terms of the proposed Settlement.

1 6. I have devoted significant time and effort to this case. This has included participating in
2 interviews, gathering and providing documents, reviewing pleadings and settlement materials, and
3 making myself available to answer questions and provide input throughout the litigation and settlement
4 process. I estimate that I spent at least 25 hours assisting with the class action claims.

5 7. There is no conflict between my interests and the interests of the Settlement Class. My
6 interests are fully aligned with those of other Settlement Class Members. I was affected by the same
7 policies and practices as other employees and seek the same relief on their behalf. I understood that, as a
8 Class Representative, I owed a fiduciary duty to absent Settlement Class Members to act in their best
9 interests, and I have taken that responsibility seriously.

10 8. I also understood that serving as a Class Representative could involve personal risk,
11 including scrutiny of my employment history and participation in litigation against my former employer.
12 I knowingly accepted those risks because I wanted to help secure meaningful relief not only for myself,
13 but for my former coworkers who were subjected to the same practices.

14 9. I have reviewed the proposed Settlement and understand its material terms. Based on my
15 experience and what my attorneys have explained to me, I believe the Settlement is fair, reasonable, and
16 adequate, particularly when weighed against the risks and uncertainties of continued litigation, including
17 the possibility that the Class could recover less, or nothing at all, if the case proceeded through trial and
18 appeal.

19 10. I understand that, unlike some of the other named Plaintiffs, I am not providing a general
20 release of claims as part of the Settlement, and that my individual FEHA and related claims are
21 expressly carved out and preserved. I understand that this carve-out was specifically negotiated and does
22 not affect my support for the Settlement on behalf of the Settlement Class and Aggrieved Employees.

23 11. I understand that my attorneys will request that the Court approve a service award of
24 \$10,000 for my efforts on behalf of the Class. I believe this amount is reasonable given the time and
25 effort I devoted to this case, my more than ten years of employment with Defendant during which I
26 experienced the practices at issue, the personal risks I accepted by serving as a Class Representative, and
27 the benefits achieved for the Class. My support for the Settlement is not contingent on receiving this
28 service award.

12. For all of these reasons, I support preliminary approval of the Settlement and believe it serves the best interests of the Class Members and Aggrieved Employees.

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

Executed on January 7, 2026 at Coachella, California.


Janette Tello (Jan 7, 2026 17:19:35 PST)
Janette Tello