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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 REBECCA
TAYLOR IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

(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, Rebecca Taylor, hereby declare as follows:

2 1. I am over the age of eighteen, a California resident, one of three Plaintiffs and Proposed
3 Class Representatives in the above-entitled matter. I submit this declaration in support of Plaintiffs'
4 Unopposed Motion for Final Approval of Class Action and PAGA Settlement and in support of Plaintiffs'
5 Motion for Class Counsel Fees and Litigation Expenses Payment and Class Representative Service
6 Award. I have personal knowledge of all the facts stated herein. I could and would competently testify
7 under oath to these facts in court if requested to do so.

8 2. I was employed by Defendant Love's Country Stores of California, Inc. ("Defendant") as
9 an hourly-paid, non-exempt employee from approximately October 14, 2020 to March 14, 2022 at
10 Defendant's location in Williams, California. At all times during my employment, I earned an hourly wage
11 and was entitled to legally compliant meal and/or rest periods, and minimum, regular and overtime wages
12 for all hours worked. Throughout my employment, I was subject to Defendant's wage-and-hour policies
13 and procedures that are at issue in this case.

14 3. I retained counsel in December 2022, and I filed a lawsuit in May 2023.

15 4. I filed the case because I believed my rights as an employee were violated by Defendant
16 and the rights of other employees that worked for Defendant. Among other claims, I believe Defendant
17 failed to pay for all time worked, failed to provide compliant meal and rest periods, failed to furnish
18 accurate itemized wage statements, failed to properly calculate the regular rate of pay for overtime and
19 premium wages, failed to reimburse for required business expenses, and failed to pay all wages when due.

20 5. Before I filed the case as a Plaintiff and Representative, I spoke at length with my attorney.
21 We discussed my work experience and how company policies were applied to me and other employees.
22 I provided the attorney with documents she requested. We reviewed the documents together and asked
23 and answered many questions regarding my experience working for Defendant, the litigation process, and
24 about the lawsuit generally.

25 6. During these conversations, I learned about my responsibilities as the plaintiff in the
26 lawsuit and as proposed a Representative and Class Representative. I understood that pursuing this action
27 as a class action substantially increased the risk to me. Those risks included the possibility of being held
28 liable for Defendant's attorneys' fees and costs in a complex class action if I lost the case. I also

1 understood that as a Class Representative, I would be under increased scrutiny by the attorneys and the
2 Court because I needed to prove that I was an adequate class representative. Further, I understood that I
3 would lose some autonomy over my individual claims that I could not make decisions for my sole benefit
4 and that I needed to make every litigation decision with the best interests of the Settlement Class in mind.

5 7. I also understood that pursuing this litigation created a very public record of my grievances
6 with Defendant which produced the risk that a future employer could hold it against me that I sued a
7 former employer.

8 8. Notwithstanding these risks and sacrifices, I decided to go through with the case because I
9 believed violations occurred and most employees would not know what their rights are and even if they
10 did, they would be apprehensive to file a lawsuit against their employer for fear of retaliation.

11 9. During the lawsuit, I communicated on a regular basis with my attorney. I reviewed status
12 updates from my attorney and court filings on a regular basis, and spoke to my attorney on the phone, via
13 email, and text messages, because I wanted to keep up with developments in the case which I understood
14 was one of my duties as a class representative.

15 10. A mediation was held on June 9, 2025. Even though I could not attend, I was available by
16 telephone to speak with my attorney and did speak with her regarding the mediation before it took place.
17 I also spoke with my attorney after the mediation and discussed the mediator's recommendation which
18 was ultimately accepted. I was very satisfied with the terms of the settlement that was agreed to by the
19 parties. I reviewed and signed the Memorandum of Understanding and when the settlement papers were
20 ready, I again spoke with my attorney and reviewed the settlement agreement which I signed on November
21 21, 2025.

22 11. Since I retained Class Counsel over three years ago, I have been actively involved with this
23 class action lawsuit performing the duties described above. While I did not keep formal time records, I
24 was in regular contact with my attorney, reviewed important court filings, and spent considerable time on
25 the issues presented during the litigation and in the settlement process. I estimate that I spent over 40
26 hours working on this case.

27 12. Also, my attorney explained to me that the settlement process involved a two-step review
28 by the Court to determine whether the settlement was fair before ordering that the settlement be funded

1 and paid. I knew this process also involved notifying all class members of the settlement terms and of
2 their rights to make a claim for their settlement share, to opt out of the settlement or to object to the
3 settlement.

4 13. Ultimately, I believe I did the right thing in pursuing this case on behalf of the class who
5 now stand to receive substantial monetary payments as a result of this case and settlement. I also believe
6 that the requested Class Representative Service Payment in the amount of \$10,000 from the settlement is
7 fair compensation for the (1) the work I performed, (2) the sacrifices made not pursuing this case
8 individually, and (3) the risks I undertook.

9 14. In light of all the time and effort I have spent on this case, the sacrifice I have made, the
10 risks I undertook by suing a former employer, the exposure to being responsible for paying Defendant's
11 costs in the event we did not win the case, and in light of the size of the settlement, I believe the request
12 for \$10,000 as a service award is fair and reasonable.

13 I declare under penalty of perjury under the laws of the State of California that the foregoing is
14 true and correct. Executed on June 23, 2026, at Williams, California.

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17 _____
18 Rebecca Taylor
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