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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

KEVISHA MARIAH BIVENS, individually, on
behalf of all others similarly situated, and on
behalf of the State of California and other
aggrieved persons; and MIKEALA KIARA
BARNES and JONATHAN ANTHONY
STOCKMAN, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

RIGHT AT SCHOOL, LLC, a limited liability
company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23STCV31316

CLASS & REPRESENTATIVE ACTION

*[Assigned for all purposes to: Hon. Carolyn
B. Kuhl, Dept. 12]*

**DECLARATION OF PLAINTIFF
JONATHAN ANTHONY STOCKMAN IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF JONATHAN ANTHONY STOCKMAN

I, Jonathan Anthony Stockman, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a current employee of Right at School, LLC (“Defendant”). I have been working for Defendant from approximately July 2024 to the present as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendant’s policies and practices that have been alleged as unlawful in the complaint and Private Attorneys General Act Notice sent to Defendant and the Labor & Workforce Development Agency.

4. The reason why I pursued this lawsuit was because I was under the impression that I was not being correctly compensated for all of the time that I worked, and I was not given the opportunity to take all of my meal and rest breaks.

5. By joining this lawsuit as one of the named class representatives, I wanted to see a future where Defendant’s policies better protected the working conditions of my co-workers.

6. I understood that it was my duty as a class representative to represent the best interest of the class, understand the claims in the lawsuit, aid my attorneys in their understanding of the facts, and stay up to date on the progress of the case.

7. I have dedicated much of my time and energy into this lawsuit as a class representative. As detailed more fully below, I have spent approximately 25 hours on this case. I wanted to be as involved as possible so that my attorneys would be equipped with the tools necessary to reach a positive outcome for me and the other class members.

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8. From the initiation of this lawsuit until now, I have spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information.

9. When I would speak with my attorneys, my attorneys and I would discuss my experience as an hourly-paid employee working for Defendant and we were able to identify various instances where I was not paid correctly.

10. Throughout the case, I spent many hours looking for documents in my possession that were related to my employment to send over to my attorneys, including when I first contacted my attorneys. Additionally, I spent time reviewing various legal documents for my case, including the retainer and settlement agreement and discussed certain terms with my attorneys.

11. I believe the settlement that was reached is one that is fair and reasonable, and I would recommend that the Court approve it. I am happy that I was able to recover some money through this settlement for myself and all the class members.

12. Making the decision to join this lawsuit was a difficult one; I was concerned by the potential negative attention that I would cause for myself as a result of this public lawsuit. I was afraid that my name would be attached to a public record reflecting that I filed a lawsuit against my employer. Ultimately, I felt that something needed to be done to recover for some of the losses that me and other class members experienced.

13. I also understand that there was financial risk in bringing this lawsuit. For example, I knew that if I was not successful in this lawsuit that I could potentially be responsible for Defendant's attorneys' fees and costs.

14. I understand that the settlement agreement provides a service payment to me of up to \$7,500.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, the settlement requires that I enter into a general release, which I understand is broader than the release that will bind other class members. I am receiving no compensation additional to that provided for in the settlement.

15. Based on my involvement in this case and the benefits provided to my co-workers, I can say I stood up and took initiative on behalf of those who felt they could not. Suing an

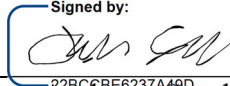
1 employer is not an easy decision, but I was not afraid to take that risk because I knew that the
2 reward of helping out my co-workers would be worth that risk.

3 16. I reviewed and signed the Joint Stipulation of Settlement and Release and my
4 attorneys answered all the questions I had. I believe the settlement terms and allocations are fair,
5 adequate, and reasonable given the strength of the class claims and Defendant's defenses.

6 17. I have no conflict of interest with any class member or the Settlement Administrator,
7 ILYM Group, Inc.

8 I declare under penalty of perjury under the laws of the State of California and the United
9 States that the foregoing is true and correct.

10 Executed on 3/7/2025, at La Quinta, California.

11
12 Signed by:

13 _____
Jonathan Anthony Stockman
22BCCBE6237A46D

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