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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
MIKEALA KIARA BARNES IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF MIKEALA KIARA BARNES

I, Mikeala Kiara Barnes, 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 former employee of Right at School, LLC (“Defendant”). I worked for Defendant from approximately September 2022 to approximately September 2023 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. I joined this lawsuit because I suspected I was not being fully compensated for all the hours I worked, and I was not consistently granted my meal and rest breaks. By serving as a class representative, I hoped to influence Defendant’s policies in a way that would improve working conditions for my co-workers. I also understood it was my responsibility to look out for the best interests of the class, stay informed about the proceedings, assist my attorneys, and remain updated on developments in this case.

5. I have devoted a significant amount of my own time and energy to this lawsuit - approximately 30 hours in total. I made it a priority to stay active in the process so I could support my attorneys in pursuing these claims.

6. Over the course of the litigation, I spent time on phone calls with my attorneys, both to receive updates and to share information. During some of those conversations, we were able to pinpoint specific occasions where I had not been paid correctly.

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7. I also worked diligently to locate and send my attorneys any documents relevant to the claims, devoting numerous hours to gathering them before mediation. I made sure to review legal documents thoroughly, including the retainer and settlement agreement and discussed their terms in detail with my attorneys.

8. I believe the settlement reached is fair, adequate, and reasonable, and I would strongly urge the Court to approve it. I am pleased I had the opportunity to serve as a class representative and help secure a settlement that benefits the class.

9. The decision to join a class action was not something I took lightly. I knew it would bring public attention, and my name would be tied to a lawsuit against my former employer. I also understood that future employers might discover I had sued Defendant. However, I felt there were important rights at stake that affected everyone, and I wanted to take action.

10. I recognized the financial risks as well; for instance, if I lost the case, I might have been held responsible for Defendant's attorneys' fees and costs.

11. Under the settlement agreement, I am eligible to receive a service payment of up to \$7,500.00. I believe this amount fairly compensates me for the time and effort I invested, as well as the potential risks to my future employment. I also acknowledge that I have signed a general release broader than the one binding other class members, and I will receive no compensation beyond what is specified in the settlement.

12. In light of my role and the positive impact this case has had on my former co-workers, I feel proud to have stood up for employees who were too fearful of losing their jobs or facing the stigma of suing an employer. I was willing to take that risk because I genuinely care about safeguarding the rights and well-being of my former colleagues.

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

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

Signed by: 
Mikeala Kiara Barnes

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