

1 JAMIE K. SERB, ESQ. (SBN 289601)
jamie@crosnerlegal.com
2 BRANDON BROUILLETTE, ESQ. (SBN 273156)
bbrouillette@crosnerlegal.com
3 ZACHARY M. CROSNER, ESQ. (SBN 272295)
zach@crosnerlegal.com
4 **CROSNER LEGAL, PC**
5 9440 Santa Monica Blvd. Suite 301
Beverly Hills, CA 90210
6 Tel: (866) 276-7637
Fax: (310) 510-6429
7

8 Attorneys for Plaintiff MARY CRAWFORD
on behalf of the State of California and all Aggrieved Employees
9 ***Additional Counsel Listed on Next Page***

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

12 EUGENE LAWSON, MARY CRAWFORD,
13 MCHARITY THOMAS, and MISHIEL
HARRISON, individually and on behalf of
14 the State of California and all Aggrieved
Employees,

15 Plaintiffs,

16 v.
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18 CAVA GROUP, INC., a Delaware
Corporation; CAVA MEZZE GRILL, LLC,
19 a Maryland Limited Liability Company;
CAVA HOLDING COMPANY; ZOE'S
20 KITCHEN USA, LLC; and DOES 1-100,
inclusive,

21 Defendants.
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Case No.: 24STCV16024

**DECLARATION OF MARY
CRAWFORD**

Date: September 23, 2025

Time: 10:30 a.m.

Dept.: SSC-1

1 Robert W. Ottinger (SBN 156825)
2 Lynsey D. Johnson (SBN 314287)
3 **THE OTTINGER FIRM, P.C.**
4 535 Mission Street
5 San Francisco, CA 94105
6 robert@ottingerlaw.com
7 lynsey@ottingerlaw.com
8 Tel: 415-262-0096
9 Fax: 212-571-0505
10 Attorneys for Plaintiff EUGENE LAWSON

11 D. LUKE CLAPP, SBN 306040
12 luke@protectionlawgroup.com
13 ARNEL O. TAN, SBN 272428
14 arnel@protectionlawgroup.com
15 JOSEPH MARSHALL, SBN 354066
16 joe@protectionlawgroup.com
17 **PROTECTION LAW GROUP, LLP**
18 149 Sheldon Street
19 El Segundo, California 90245
20 Telephone: (424) 290-3095
21 Facsimile: (866) 264-7880
22 Attorneys for Plaintiff CHARITY THOMAS

23 Roman Otkupman, CSBN 249423
24 Roman@OLFLA.com
25 Nidah Farishta, CSBN 312360
26 Nidah@OLFLA.com
27 **OTKUPMAN LAW FIRM, A LAW CORPORATION**
28 5743 Corsa Ave., Suite 123,
Westlake Village, CA 91362
Telephone: (818) 293-5623
Facsimile: (888) 850-1310
Attorneys for Plaintiff MISHIEL HARRISON

1 I, MARY CRAWFORD, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiffs' Motion for Approval of Settlement under Private Attorneys
5 General Act.

6 2. I worked for Defendant CAVA in its Westwood location as an hourly Crew Member
7 and Cook from approximately September 2023 to January 2024. While I worked there I don't think
8 I was paid for all the hours I worked because I regularly had to work even though I was clock out
9 for lunch, or had already clocked out for the day, and this time wasn't recorded or paid for. I also
10 think that I and other employees received proper meal periods because our lunches frequently started
11 late, were cut short by work, or missed completely. The same thing happened for rest breaks as well,
12 and those breaks also were cut short or simply didn't happen. I also had to use my own cell phone
13 for work purposes such as communicating with other crew members or supervisors, and I never
14 received any reimbursement for that.

15 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
16 employee of Defendant with regard to not being paid correctly, not getting all of my lunches and
17 breaks like I was supposed to, and having to use my phone for work.

18 4. It is my understanding this lawsuit could not have been prosecuted or settled on
19 behalf of the other employees unless I or some other current or former employee decided to serve
20 as a named plaintiff and proposed PAGA representative. In deciding to serve as a named plaintiff
21 in this case, I understood that my name could be publicly attached to this lawsuit and that my work
22 experiences to some extent would be set forth in a public court file. I recognized I would need to
23 devote a certain amount of time that I could have spent otherwise. I also recognized my bringing
24 the lawsuit carried some degree of risk for defendant's legal costs among other things. Despite
25 this, I decided to serve as the named plaintiff and PAGA rep without any promise of recovery or
26 compensation.

27 5. I am familiar with the work involved in prosecuting this case. I have participated in
28 meetings, phone calls, and other communications with my lawyers regarding this case. I am

1 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
2 events in this case, including the investigation performed by my lawyers, the mediation with
3 Defendants that eventually resulted in this settlement, and the preparation of settlement papers and
4 the need to obtain court approval of the proposed settlement. I participated in the litigation and
5 provided my lawyers with information and documents regarding my employment with Defendant.

6 6. I believe that the proposed settlement obtained on behalf of the State and other
7 aggrieved employees is excellent in view of the issues and risks involved with the case.

8 I declare under penalty of perjury under the laws of California that the foregoing is true
9 and correct. Executed on 08 / 29 / 2025, at Los Angeles, California.

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13 MARY CRAWFORD
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Title	Declaration of Mary Crawford
File name	CAVA-_M._Crawford_declaration.docx
Document ID	806255bc55b274d44894cdd8c9e0a467a37964f1
Audit trail date format	MM / DD / YYYY
Status	● Signed

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