

1 JAMIE K. SERB, ESQ. (SBN 289601)
jamie@crosnerlegal.com
2 NIKKI TRENNER, ESQ. (SBN 316007)
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 Attorneys for Plaintiff MARY CRAWFORD
on behalf of the State of California and all Aggrieved Employees
8 *Additional Counsel Listed on Next Page*

9
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
the State of California and all Aggrieved
Employees,

14 Plaintiffs,

15
16 v.

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

21 Defendants.

Case No.: 24STCV16024

**DECLARATION OF PLAINTIFF
MISHIEL HARRISON IN SUPPORT OF
MOTION FOR APPROVAL OF
SETTLEMENT UNDER PRIVATE
ATTORNEY'S GENERAL ACT**

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 HEATHER DAVIS, SBN 239372
12 heather@protectionlawgroup.com
13 RYAN T. CHUMAN, SBN 300695
14 ryanc@protectionlawgroup.com
15 ARNEL O. TAN, SBN 272428
16 arnel@protectionlawgroup.com
17 JOSEPH MARSHALL, SBN 354066
18 joe@protectionlawgroup.com
19 **PROTECTION LAW GROUP, LLP**
20 149 Sheldon Street
21 El Segundo, California 90245
22 Telephone: (424) 290-3095
23 Facsimile: (866) 264-7880
24 Attorneys for Plaintiff CHARITY THOMAS

25 Roman Otkupman, CSBN 249423
26 Roman@OLFLA.com
27 Nidah Farishta, CSBN 312360
28 Nidah@OLFLA.com
29 **OTKUPMAN LAW FIRM, A LAW CORPORATION**
30 5743 Corsa Ave., Suite 123,
31 Westlake Village, CA 91362
32 Telephone: (818) 293-5623
33 Facsimile: (888) 850-1310
34 Attorneys for Plaintiff MISHIEL HARRISON

1 I, MISHIEL HARRISON, declare as follows:

2 1. I am a named representative in this case. I submit this declaration in support of
3 Plaintiffs' Motion for Approval of PAGA Settlement. I make this statement of my own personal
4 knowledge, and if called to testify, I could and would testify competently to the facts below.

5 2. I was employed by CAVA MEZZE GRILL, LLC ("Defendant"), as an hourly paid
6 non-exempt employee.

7 3. During my time working for Defendant, I was not paid all wages, including all
8 minimum and overtime wages owed to me and I was denied uninterrupted meal and rest breaks. I
9 was also not reimbursed for having to use my personal cell phone for the benefit of Defendant or
10 for uniform maintenance.

11 4. During the time that I was employed at Defendant, I followed the same timekeeping,
12 scheduling and payroll policies and practices as the other hourly employees I observed and
13 interacted with.

14 5. At the beginning of this case, my attorneys made me aware of the general obligations
15 of serving a representative Plaintiff in this case. Because of the wage and hour violations that I
16 experienced during my employment with Defendant, I agreed to serve as a representative Plaintiff
17 and pursue my case as a representative action on behalf of the State of California and similarly
18 situated employees of Defendant.

19 6. By deciding to serve as a Named Plaintiff in this case, I agreed to pursue not only
20 my own PAGA claims, but the claims of all similarly situated employees of Defendant, and, if
21 necessary, to put the interest of all similarly situated employees ahead of my own. I have no interests
22 that are antagonistic to my coworkers with respect to the claims alleged in this case. I pledged to
23 actively participate in the lawsuit and to assume the risks of serving as a Named Plaintiff in a
24 representative action. My attorney also explained the risks associated with litigation, and that the
25 case could take years to resolve, and therefore required a long-term commitment on my part. I also
26 understood that I was potentially responsible for paying Defendant's attorney's fees and costs.

27 7. During this litigation, I have spent a significant amount of time working with my
28 attorneys and participating in this lawsuit as follows:

a. I regularly conferenced with my attorneys, before and after the filing of the
lawsuit, to discuss the status of the case, to offer my input on Defendant's practices and
policies, to provide names of witnesses, to assist in gathering evidence and documents that

1 supported the class claims, to review policy documents and payroll records from Defendant,
2 and to discuss settlement options; and

3 b. I also spent significant time helping my attorneys prepare for mediation and
4 answering questions about how Defendant's policies and practices impacted me and my
5 coworkers. I made myself available during the entirety of the all-day mediation which took
6 place on Zoom, approved the tentative settlement, and reviewed and approved the final
7 settlement agreement. I regularly spoke with my attorneys to make sure I was fully informed
8 of the facts and settlement negotiations.

9 8. By agreeing to bring this representative action, I accepted the responsibilities of
10 representing the interests of the State of California as well as all similarly situated employees and
11 willingly chose to assume risks and potential costs associated with the case. I did, and still do, have
12 a fear that future employers may not hire me should they find out that I served as a representative
13 Plaintiff in a PAGA lawsuit. However, this is another risk I am willing to take in order to further
14 the interests of the case.

15 9. I am aware that Defendant denies the allegations in this lawsuit and that there has
16 been no determination that Defendant is actually liable for any of these alleged violations. I also
17 understand that there are many risks and uncertainties involved in continuing to pursue this case. I
18 have been advised of the terms of the proposed settlement of this case, and in light of the risks and
19 uncertainties in proceeding with the case, I believe the proposed settlement is fair and reasonable
20 and in the best interests of the aggrieved employees.

21 I declare under penalty of perjury that the foregoing is true and correct under the laws of the
22 State of California. Executed on 08 / 29 / 2025, at Bellflower, California.

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25 MISHIEL HARRISON
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