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Attorneys for Plaintiff, DERICK ANTHONY BUTLER,

on behalf of himself and all others similarly situated

and aggrieved

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

DERICK ANTHONY BUTLER, an individual  
and on behalf of all others similarly situated,

Plaintiff,

v.

SEE'S CANDY SHOPS INCORPORATED, a  
California Corporation; and DOES 1 through  
100, inclusive,

Defendant.

CASE NO.: 24STCV09521

[Assigned to the Hon. Samantha P. Jessner in  
Dept. 7]

**DECLARATION OF PLAINTIFF  
DERICK ANTHONY BUTLER IN  
SUPPORT OF PLAINTIFF'S MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS AND REPRESENTATIVE  
ACTION SETTLEMENT**

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1 an opportunity to take and am informed and believe that my coworkers were not provided  
2 premium pay for not being provided with the opportunity to take full, uninterrupted 10-minute  
3 rest periods, either.

4 9. Before and during the course of litigation, I was actively involved in assisting my  
5 attorneys to support the wage and hour claims asserted. My involvement began before the initial  
6 complaint was filed wherein, I provided first-hand knowledge and documentation as to  
7 Defendant's practices, their ownership and corporate structure, and their wage and hour policies  
8 and practices.

9 10. Part of the information I relayed was with regard to Defendant's timekeeping policies  
10 and practices, and their meal and rest period policies and practices.

11 11. I provided them with all the documentation provided to me by Defendant during my  
12 employment.

13 12. I assisted in reviewing time and payroll records with my attorneys, and informed  
14 them of Defendant's employment policies, and whether those policies matched Defendant's  
15 practices.

16 13. My attorneys called me to ask me questions over several times throughout the  
17 litigation and I contacted my attorneys several times to stay updated on the case and offer my  
18 assistance on any matters I could be helpful with. I was also available for mediation by telephone,  
19 during which I was available to be called to answer the questions posed by the mediator regarding  
20 the asserted claims, as well as arguments raised by Defendant. In addition, I worked with my  
21 attorneys over the next several weeks after mediation to understand and execute a long form  
22 settlement agreement.

23 14. Over the past few months since the mediation has been resolved, I have stayed in  
24 touch with my attorneys to ensure that there was no undue delay in payment for other class  
25 members for whom I brought this Action.

26 15. I believe that, through the present, I have spent at least 28 hours in connection with  
27 this matter, which included time spent having preliminary calls with my attorneys; doing an intake  
28 with my attorneys; time spent searching for documents relating to my employment; time spent

1 responding to informal discovery; time spent reading and understanding the Settlement  
2 Agreement; time spent answering calls to discuss Defendant's timekeeping, pay, meal and rest  
3 periods, and to review time and payroll records; time spent discussing with my attorneys  
4 Defendant's policies and practices; time spent on-call at mediation; and time spent checking in on  
5 the status of the case, among other things. I also spent time preparing this declaration to support  
6 Plaintiff's Motion for Preliminary Approval of Class and Representative Action Settlement.

7 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the  
8 rights of other employees who suffered from the same unfair wage practices. I felt that current  
9 employees might not want to share their experiences with Defendant since they feared losing their  
10 jobs. This is certainly understandable as I, too, have to provide for myself and others.

11 17. By bringing this lawsuit, I have put the interests of the class ahead of my own.

12 18. I understood that I could possibly earn a small enhancement if this case is resolved  
13 favorably. I also knew that I could face retaliation from Defendant and backlash from former  
14 coworkers who are loyal to Defendant. I have also had to provide a general release of claims to  
15 Defendant as part of the settlement. My understanding, in addition, is that if I brought this case  
16 individually, I may have earned more compensation individually and on a much quicker timeline  
17 than the timeline to resolve this Action.

18 19. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class,  
19 and, even more importantly, to put an end to what I believe are illegal practices on the part of  
20 Defendant. I believe I have achieved both through this lawsuit and settlement.

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22 I declare under penalty of perjury under the laws of the State of California that the  
23 foregoing is true and correct this ~~30~~ day of April 2026, at 12:15pm, California.

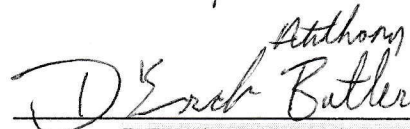
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DERICK ANTHONY BUTLER