

Brian J. Mankin, Esq. [CSB No. 216228]
Peter J. Carlson, Esq. [CSB No. 295611]
LAUBY, MANKIN & LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly situated
[Additional Counsel for Plaintiffs on Following Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

JUSTIN BROWN, and SHAYNA AMSTER
individually, on a representative basis, and on
behalf of all others similarly situated;

Plaintiff,

v.

JOSHUA'S PEST CONTROL, a California
Limited Partnership; MOXIE PEST
CONTROL, L.P., an Entity Unknown; MOXIE
ADVISORS, LLC, a Utah Limited Liability
Company; WALTON HOLDINGS GP, LLC, a
Texas Limited Liability Company;
MGFLEMING HOLDINGS, INC., a
California Corporation; and DOES 1 through
20, inclusive;

Defendants.

Case No.: CVRI2402875

Assigned for All Purposes to:
Honorable Harold Hopp
Department 1

CLASS ACTION

**DECLARATION OF SHAYNA AMSTER
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES
AND COSTS AWARD, AND SERVICE
PAYMENTS**

Hearing Date: May 8, 2026
Hearing Time: 8:30 a.m.
Hearing Place: Department 1

DOUGLAS HAN (SBN 232858)
SHUNT TATAVOS-GHARAJEH (SBN 272164)

JUSTICE LAW CORPORATION

751 N. Fair Oaks Avenue, Suite 101

Pasadena, California 91103

Telephone: (818) 230-7502

Facsimile: (818) 230-7259

Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly situated

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I, **SHAYNA AMSTER**, hereby declare as follows:

1. I am over eighteen (18) years of age and a resident of California. I am the named plaintiff in the above-captioned case, and I have personal knowledge of the facts and statements set forth herein. If called upon to testify, I could and would competently testify.

2. I was employed by Defendants as an hourly-paid, non-exempt employee during the relevant time period. During my employment, I was often prevented from taking compliant breaks (*e.g.*, missed, late) largely due to heavy workloads and managerial interference. Following my employment, I sought legal advice regarding my time with Defendants to explore the possibility of filing a lawsuit to redress my grievances. Pursuant to this, I contacted Justice Law Corporation and spoke with the attorneys there, including Douglas Han, Esq., to receive legal consultation about my work experience. During this time, Mr. Han informed me about other potential wage-and-hour violations that I may have faced during my employment with Defendants (*e.g.*, not being reimbursed for business expenses). Following this consultation, I wanted to do whatever I could to hold Defendants accountable and ensure that they stopped the improper, uniform practices.

3. Mr. Han explained the possibility of starting a class action and/or Private Attorneys General Act of 2004 (“PAGA”) lawsuit. Mr. Han also indicated that I may have to sacrifice my potential individual claims in exchange for pursuing claims on behalf of all the employees. I was even informed of the risks and sacrifices associated with serving as a representative (*e.g.*, risking a judgment of attorneys’ fees and costs entered against me, agreeing to a broader release). I struggled with the decision to bring my own claims versus bringing claims on behalf of the Class and informed Mr. Han that I would be in touch.

4. After my initial consultation, I investigated class action and PAGA lawsuits and did some research of the leading class action and employment law firms in California for about two and one-half (2.5) hours. I then spoke with the attorneys at Justice Law Corporation for around one and one-half (1.5) hours to further discuss my situation, class action and PAGA lawsuits, and what it meant to be a representative.

1 5. I have spent over thirty (30) hours meeting with my attorneys regarding
2 the case and performing my responsibilities as a class representative. These responsibilities
3 included: (a) gathering my employment documents (*e.g.*, personnel records) to give my attorneys
4 an idea of the policies, practices, and procedures that I was exposed to; (b) reviewing documents
5 with my attorneys and answering any pertinent questions and inquiries; (c) providing the names
6 and contact information of the putative class members for my attorneys to locate and interview to
7 corroborate the allegations; (d) speaking with other current and former employees of Defendants
8 to gather support for my claims; (e) providing guidance regarding other employees' duties and
9 responsibilities to help determine commonality and typicality; (f) discussing my employment
10 experience (and work environment); (g) reviewing the operative complaint and Settlement
11 Agreement (and exhibits); (h) reviewing the written notices sent to the California Labor
12 Development and Workforce Agency; (i) helping my attorneys develop strategies to obtain
13 additional documents; (j) looking over the formal discovery requests before propounding them,
14 including the responses; and (k) preparing for and making myself available all to provide my
15 thoughts regarding the settlement negotiations. I routinely checked in with my attorneys and their
16 staff to ensure that they had my most current information and any additional material that I
17 obtained from speaking to current and former employees of Defendant..

18 6. I have made myself available to meet and speak with my attorneys
19 whenever they needed me. I have responded to my attorneys' questions and inquiries as quickly
20 as possible and have given them as much information as I could gather (*e.g.*, names and contact
21 information of the putative class members, various violations that I experienced and witnessed,
22 policy documents that I was given during my employment). I also spent at least four to five (4-5)
23 additional hours discussing the case with my attorneys (*e.g.*, applicable legal theories to explore,
24 pertinent information to request, importance of the documents produced, relative strengths of the
25 allegations) and sending them relevant documents and information.

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1 7. The description of my work experience coupled with authorizing the
2 receipt of my employment documents helped my attorneys develop their legal theories and
3 determine the extent and frequency of the alleged day-to-day violations. By providing the names
4 and contact information of the putative class members, my attorneys located and interviewed
5 them, allowing my attorneys to corroborate existing legal theories. The collection of this
6 information refined my attorneys' understanding of the policies, practices, and procedures in
7 place and informed them of the legal theories to further develop and emphasize during settlement
8 negotiations. Even if a similar settlement had been reached down the line, it would have been
9 significantly undercut by the costs and expenses incurred.

10 8. During discovery, I spent almost an entire day digging through emails
11 seeking documents and information that would be responsive to potential discovery requests. In
12 fact, discovery was another essential component that contributed to the settlement of this case.
13 For instance, the several consultations with my attorneys assisted them with determining the
14 relevant documents to gather (*e.g.*, personnel records, employee guides, policy documents,
15 sampling of time and pay records). By extension, obtaining an appropriate sampling of time and
16 pay records aided my attorneys with accurately calculating potential damages for settlement
17 purposes, giving them the necessary information to negotiate a settlement. I was also informed
18 that I may be called in for a deposition at one point. While I was ultimately not deposed, I was
19 ready and willing to spend as much time as necessary to give my testimony.

20 9. Regarding the settlement itself, I was available to answer any questions
21 my attorneys had. During settlement negotiations, I made myself accessible all day via phone
22 call and Zoom to respond to any inquiries and to provide my input regarding the negotiations.
23 When my attorneys asked me to review the Settlement Agreement (and exhibits), I took about
24 two (2) hours to review it. I then spent around an hour asking questions and discussing the terms
25 and provisions of the settlement with my attorneys before signing it.

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1 10. I was advised by my attorneys that I might have difficulty finding
2 employment in the future compared to candidates who have not been a part of class action and/or
3 PAGA lawsuits against their employers. Furthermore, as a class representative, I was required to
4 provide a broader release compared to the other Class Members. This included a general release
5 of all known or unknown claims and expressly waiving and relinquishing the provisions, rights
6 and benefits, if any, of section 1542 of the Civil Code or similar provisions of applicable law.
7 Thus, it was a serious risk being a part of a class action and PAGA lawsuit, but I did not allow
8 this to deter me from seeking justice.

9 11. I have done everything my attorneys have asked of me and have tried to
10 represent the Class Members to the best of my abilities. I believe that my efforts helped achieve
11 the results obtained herein. I request that the Court award me the Service Payment of \$10,000 for
12 my active participation and sacrifices.

13 12. Serving as a class representative is not something that I took lightly.
14 Considering the time dedicated, benefits conferred to the Class Members, lack of personal
15 benefits received (e.g., forgoing potential individual claims to be a part of a class action and
16 PAGA lawsuit instead of filing a quicker individual lawsuit), risking a judgment of attorneys'
17 fees and costs entered against me, agreeing to a broader release, and losing a potential source of
18 income, I believe that the Service Payment is reasonable and justified.

19 13. I am not related to anyone associated with Justice Law Corporation or
20 Lauby, Mankin & Lauby LLP nor have I entered any undisclosed agreements or received any
21 undisclosed compensation.

22 14. The estimated Individual Class Payment that I expect to receive as a Class
23 Member is \$191.97.

24 I declare that under the penalty of perjury under the laws of California the foregoing is
25 true and correct. Executed this 04/08/2026 at San Diego, California.

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27 _____
28 Shanya Amster