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8 Attorneys for Plaintiffs,

9 BETHANY CLAYTON, YASMIN SOLTANI, and all others similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT**

12 **(UNLIMITED JURISDICTION)**

13 BETHANY CLAYTON and YASMIN
14 SOLTANI, as “aggrieved employees” on
15 behalf of themselves and other similarly
16 situated “aggrieved employees” under the
17 Labor Code Private Attorneys General Act of
18 2004,

19 *Plaintiffs,*

20 vs.

21 SALTIE GIRL LA LLC, a California limited
22 liability company; and DOES 1 to 25,
23 inclusive,

24 *Defendants.*

Case No.: 25STCV14374

**DECLARATION OF YASMIN SOLTANI
IN SUPPORT OF PLAINTIFF’S MOTION
FOR APPROVAL OF PAGA SETTLEMENT**

Action filed: May 15, 2025

Hearing Date: September 2, 2025

Hearing Time: 8:30 a.m.

Hearing Dept: 36, Hon. Wendy Chang

Reservation Number: 075234161417

DECLARATION OF YASMIN SOLTANI IN SUPPORT OF
PAGA SETTLEMENT AND RELEASE

I, YASMIN SOLTANI, declare and state as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Maralle Messrelan of MM Law, APC in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I started working for Defendant Saltie Girl LA LLC (“SALTIE GIRL”) as a server on or around May 4, 2024 at its restaurant located at 8615 Sunset Blvd, West Hollywood, CA 90069. My employment with Defendant ended on or around June 28, 2024.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that SALTIE GIRL is the Defendant. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other SALTIE GIRL employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not paid for all hours worked at the correct rates of pay, provided all required meal and rest periods, and reimbursed for necessary business expenses, such as personal mobile phones for work purposes. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don’t have any disagreements with the other SALTIE GIRL employees I represent. I am not aware of any reason why I can’t make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing SALTIE GIRL. I agreed that I would do what is in the best interest of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

5. The PAGA statute does not forbid service awards. Courts frequently award them in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys, speaking with my attorneys on many occasions by phone, explaining what my employment at

1 SALTIE GIRL was like, explaining what my employment at SALTIE GIRL had in common
2 with other employees who worked for SALTIE GIRL, explaining my claims to my attorneys,
3 and communicating with my attorneys about the settlement agreement and related documents.
4 Despite this, I am **not** asking for a service award for my involvement and the time I spent
5 assisting my counsel with the PAGA action.

6 6. I negotiated an individual settlement of my harassment and wrongful
7 constructive discharge claims after the Parties had agreed to the Settlement of the PAGA action.

8 7. As part of my individual settlement, I signed a general release of all claims,
9 whether known or unknown, that I may have against Defendant, not only PAGA claims.

10 8. I don't believe that my individual settlement has any bearing on whether I have
11 served the Aggrieved Employees' best interests and will continue to do so. Nevertheless, I am
12 willing to provide it to the Court *in camera* if the Court so requests.

13 I declare under the penalty of perjury of the laws of the State of California that the
14 foregoing is true and correct to the best of my knowledge.

15 Executed on June 13, 2025 at Los Angeles California.

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YASMIN SOLTANI (Jun 13, 2025 16:50 PDT)

17 YASMIN SOLTANI,
18 Declarant
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