

DIVERSITY LAW GROUP, P.C.
Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Simon L. Yang (State Bar No. 260286)
sly@diversitylaw.com
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile: (213) 488-6554

POLARIS LAW GROUP
William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
501 San Benito Street, Suite 200
Hollister, California 95023
Telephone: (831) 531-4214
Facsimile: (831) 634-0333

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KERRY CONNELLY, as an individual and as a
private attorney general,

Plaintiff,

vs.

STARBUCKS CORPORATION, a Washington
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 1:21-cv-00746-ADA-SAB

**DECLARATION OF KERRY CONNELLY
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA SETTLEMENT**

Date: August 28, 2023
Time: 1:30 p.m.
Courtroom: 1

Complaint Filed: January 21, 2021

1 I, Kerry Connelly, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. I began working for Starbucks Corporation around October 2017. Until my employment
7 ended in October 2020, I was paid on an hourly basis as a non-exempt employee. Whenever I was paid
8 shift differential wages or other non-“regular time” wages, I was not furnished wage statements that
9 itemize and show the total hours worked. Instead, the “gross hours” shown on the wage statement
10 itemize an inaccurate number of hours. Moreover, when the hours shown on the wage statements are
11 added up, the sum also does not equal the total hours worked.

12 3. I understand that this action is being prosecuted on behalf of the State of California and
13 that I am acting as a private attorney general. I have taken all necessary steps to represent the interests of
14 the State, including by providing information and documents to my counsel, discussing the claims and
15 lawsuit with my counsel, and answering any questions that have come up, including about how I was
16 paid or what my wage statements show or meant. Each month during the more than two years that the
17 lawsuit has been pending, I have spent a couple of hours, on average, to progress this lawsuit. I had to
18 appear for a deposition as well as participate in other parts of the discovery process.

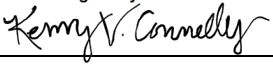
19 4. I understand that I am responsible to the State with respect to trying the case, appearing
20 in court, and working with my counsel. I remain willing to devote my time to this lawsuit for the benefit
21 of the State. I do not believe I have any interests that are adverse to the interests of the State. I also am
22 unaware of any such issues having been raised or presented by anyone else.

23 5. I believe many employees would not sue their employer out of fear. I took on risks by
24 bringing this lawsuit, and I understand that the State and others will benefit because of the actions that I
25 have taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the
26 settlement is fair, adequate, and reasonable.

27 6. I am informed and believe that the individual claim under Labor Code section 226(a) that
28 I pled in this lawsuit would entitle me to \$2,050 in penalties if I were to prevail at trial. I also am

1 informed and believe that an individual under Labor Code section 203 that I did not plead in this lawsuit
2 would entitle me to around \$3,156 in additional penalties if I were to litigate the claims and prevail at
3 trial. I am also informed and believe that there are other individual claims that I could pursue in
4 litigation (for example, related to my tips, among others). Nonetheless, I am executing a general release
5 of any and all claims, including any rights I have under Civil Code section 1542. I understand the
6 proposed settlement does not require similar releases of any other employees.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct. Executed this 18th day of July 2023, at Woodbridge, California.

9 DocuSigned by:
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11 A2D764CF155B49B... Kerry Connelly
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