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Attorneys for Defendant, S&B Restaurant Group LLC, dba
Chick-Fil-A, a California limited liability company

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

TATIANA BOVE, an individual, on behalf
of herself, and on behalf of all persons
similarly situated,

Plaintiff,

vs.

S&B RESTAURANT GROUP LLC dba
CHICK-FIL-A, a California limited liability
company; and DOES 1-50, Inclusive,

Defendants.

Case No.: 23STCV02528

**DECLARATION OF STANLEY WEBSTER
IN SUPPORT OF PRELIMINARY
APPROVAL**

I, Stanley Webster, declare as follows:

1. I am the sole owner and operator of named Defendant, S&B RESTAURANT GROUP LLC dba CHICK-FIL-A ("S&B"), in the above-referenced proceeding. All of the facts stated herein are within my personal knowledge and, if called to testify, I could and would testify competently as follows:

2. On or around September 25, 2023, I provided S&B's attorneys, Doug M. Larsen and Michael W. Green of the law firm of Fishman, Larsen & Callister, with a list of every employee employed by S&B up to that date. That list contained the dates each employee's

1 employment began and ended. To the best of my knowledge, that list accurately reflected the
2 actual hire and fire dates of S&B's employees. Based on the data available in that list, and with
3 the assistance of S&B's attorneys, I estimated, for mediation, that S&B employed 381 non-
4 exempt employees who worked 18,425 workweeks between February 6, 2019, and January 9,
5 2024.

6 3. On or around June 28, 2024, I provided S&B's attorneys with an updated list of
7 every employee employed by S&B up to that date. That list contained the dates each employee's
8 employment began and ended. To the best of my knowledge, that list accurately reflects the
9 actual hire and fire dates of S&B's employees. Based on the data available in that list, and with
10 the assistance of S&B's attorneys, S&B employed 398 non-exempt employees who worked
11 18,097 workweeks between February 6, 2019, and January 9, 2024.

12 4. I do not have any actual or potential conflicts of interest with Apex Class Action
13 LLC.

14 5. I am not aware of any other pending matter or action asserting claims that will be
15 extinguished or adversely affected by the Settlement.

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct and that this declaration is executed on July 2, 2024, at Los
18 Angeles, California.

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22 Stanley Webster
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