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Attorneys for PLAINTIFF SHAWNETTE SNOWDEN

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

SHAWNETTE SNOWDEN, an individual, in
her representative capacity on behalf of the
State of California and fellow Aggrieved
Employees,

Plaintiff,

v.

PALMDALE 794 INC. dba IHOP 794, a
California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No.: 23STCV02326

**DECLARATION OF PLAINTIFF
SHAWNETTE SNOWDEN IN SUPPORT
OF PLAINTIFF'S MOTION TO
APPROVE PAGA SETTLEMENT**

Date: January 21, 2025
Time: 8:30 a.m.
Reservation ID: 409184166849

Judge: Hon. Joseph Lipner
Dept: 72

1 I, SHAWNETTE SNOWDEN, declare as follows:

2 1. I am a party to this action and reside in the State of California. I am fully competent
3 to make this declaration. I have personal knowledge of the facts set forth herein, except for those
4 stated on information and belief, and as to those I am informed and believe them to be true. If called
5 upon to testify, I could and would testify as set forth herein.

6 2. I make this Declaration in support of Plaintiff's Motion to Approve PAGA
7 Settlement.

8 3. I was employed by Defendant Palmdale 794 Inc. dba IHOP 794 ("Defendant"), as a
9 non-exempt, hourly-paid employee within California from approximately November of 2021
10 through February of 2022.

11 4. Throughout my employment with Defendant, I am informed and believe that myself
12 and other non-exempt, hourly-paid employees of Defendant were not paid all wages owed because
13 we were not paid for all time under Defendant's control, or for which we were suffered or permitted
14 to work by Defendant. In addition, I am informed and believe we were not paid or underpaid for
15 overtime hours worked due to, without limitation, failure to record all time worked and failure to
16 pay for off-the-clock work.

17 5. During my employment with Defendant, I often took meal periods that were after the
18 fifth hour, short, or not duty-free. I witnessed other non-exempt, hourly-paid employees with my
19 job duties often taking meal periods that were after the fifth hour, short, or not duty-free, as well.

20 6. I do not believe I was provided with opportunities to take full, uninterrupted, 10-
21 minute rest periods while working for Defendant and am informed and believe my coworkers were
22 not provided with such an opportunity, either.

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

27 8. Part of the information I relayed was with regard to Defendant's timekeeping policies
28 and practices, and its meal and rest period policies and practices.

1 9. I provided my attorneys with documentation provided to me by Defendant during
2 my employment.

3 10. I assisted in reviewing time and payroll records with my attorneys and informed them
4 of Defendant's employment policies and whether those policies matched Defendant's practices.

5 11. My attorneys called me to ask me questions over several times throughout the
6 litigation and I contacted my attorneys several times to stay updated on the case and offer my
7 assistance. I was also available for mediation by telephone, and was prepared to answer the questions
8 posed by the mediator regarding the asserted claims, as well as arguments raised by Defendant. In
9 addition, I worked with my attorneys over for several months after mediation to understand and
10 execute a long form settlement agreement.

11 12. Over the past few months since the case has been resolved, I have stayed in touch
12 with my attorneys to ensure that there was no undue delay in payment for other aggrieved employees
13 who were represented in this Action.

14 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
15 rights of other employees who suffered from the same unfair wage practices. I felt that current
16 employees might not want to share their experiences with Defendant since they feared losing their
17 jobs.

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

21 21. I understand the obligations of adequately representing the non-exempt, hourly paid
22 employees of the Defendant.

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1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct this 23 day of October 2024, at Hawthorne, California.

3 Shawnette Snowden
4 Shawnette Snowden (Oct 23, 2024 07:48 PDT)
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