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Attorneys for SAVANNAH L. BURNETT, as an aggrieved employee,
and on behalf of all other aggrieved employees

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

LUTHER RODDY and SAVANNAH L.
BURNETT, individuals, on behalf of the state
of California, as a private attorneys general,

Plaintiff,

v.

O'NEILL BEVERAGES CO. LLC, a
Delaware Limited Liability Company; and
DOES 1-50, Inclusive,

Defendants.

Case No.: CIV2200067

[Assigned for all purposes to the Hon. Stephen
Freccero in Dept. A]

**DECLARATION OF PLAINTIFF
SAVANNAH L. BURNETT IN SUPPORT
OF PLAINTIFF'S MOTION FOR
APPROVAL OF REPRESENTATIVE
SETTLEMENT**

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

1 8. I do not recall receiving any premium pay for the full rest breaks I was not provided
2 an opportunity to take and am informed and believe that my coworkers were not provided premium
3 pay for not being provided with the opportunity to take full, uninterrupted 10-minute rest periods,
4 either.

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

9 10. Part of the information I relayed was with regard to Defendant's timekeeping policies
10 and practices, and their meal and rest period policies and practices.

11 11. I provided my attorneys with all the documentation provided to me by Defendant
12 during my employment.

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

15 13. My attorneys called me to ask me questions over several times throughout the
16 litigation and I contacted my attorneys several times to stay updated on the case and offer my
17 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
18 during which I was available to be called to answer the questions posed by the mediator regarding
19 the asserted claims, as well as arguments raised by Defendant. In addition, I worked with my
20 attorneys over the next several months after mediation to understand and execute a long form
21 settlement agreement.

22 14. Over the past few months since the mediation has been resolved, I have stayed in
23 touch with my attorneys to ensure that there was no undue delay in payment for other aggrieved
24 employees for whom I brought this Action.

25 15. I believe that, through the present, I have spent at least 22 hours in connection with
26 this matter, which included time spent having preliminary calls with my attorneys; doing an intake
27 with my attorneys; time spent searching for documents relating to my employment; time spent
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1 reading and understanding the Settlement Agreement; time spent answering calls to discuss
2 Defendant's timekeeping, pay, meal and rest periods, and to review time and payroll records; time
3 spent discussing with my attorneys on Defendant's policies and practices; time spent on-call at
4 mediation; and time spent checking in on the status of the case, among other things. I also spent
5 time preparing this declaration to support Plaintiff's Motion for Approval of Representative Action
6 Settlement.

7 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
8 rights of other employees who suffered from the same unfair wage practices. I felt that current
9 employees might not want to share their experiences with Defendant since they feared losing their
10 jobs. This is certainly understandable as I, too, have to provide for myself and others.

11 17. By bringing this lawsuit, I have put the interests of the aggrieved employees ahead
12 of my own.

13 18. I understood that I could possibly earn a small enhancement if this case is resolved
14 favorably. I also knew that I could face retaliation from Defendant and backlash from former
15 coworkers who are loyal to Defendant.

16 19. I have also had to provide a general release of claims to Defendant as part of the
17 settlement. My understanding, in addition, is that if I brought this case individually, I may have
18 earned more compensation individually and on a much quicker timeline than the timeline to resolve
19 this Action.

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

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

25 22. I understand the substantial burden I will have to undertake in order to represent the
26 non-exempt, hourly paid employees of the Defendant.

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I declare under penalty of perjury under the laws of the State of California that the foregoing
is true and correct this 2 day of May 2024, at Raisin City, California.

Savannah Burnett
Savannah Burnett (May 2, 2024 16:02 PDT)
SAVANNAH L. BURNETT