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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

WAFA MOWANNES, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act;

Plaintiff,

v.

STATER BROS. MARKETS, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: CIVSB2332884

Honorable Stephanie Tanada
Department S33

CLASS ACTION

**DECLARATION OF PLAINTIFF WAFA
MOWANNES IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT PAYMENT**

Date: April 21, 2026
Time: 8:30 a.m.
Department: S33

Complaint Filed: December 21, 2023
FAC Filed: October 30, 2024
Trial Date: None Set

DECLARATION OF WAFA MOWANNES

I, **Wafa Mowannes**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Stater Bros. Markets ("Defendant") as an hourly-paid, non-exempt employee from approximately October 2022 to approximately June 2023. I decided to seek legal advice about my work experiences with Defendant and about pursuing my wage-and-hour issues. Because I was impressed by how Lawyers for Justice, PC represented me in an unrelated legal matter, I agreed to have Lawyers for Justice, PC represent me in this matter. I wanted to do whatever I could to make sure Defendant was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout this matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent time speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I reviewed the Settlement Agreement and discussed the questions I had regarding the potential settlement with my attorneys before signing the settlement papers.

1 6. I understand that a settlement has been reached in my case and what my duties and
2 responsibilities are as a class and PAGA representative. For example, I am aware that if the
3 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,
4 and likely appoint me as the representative of the class and my attorneys as counsel for the class.
5 I also understand that my duties will include checking in on, monitoring, and conferring with my
6 attorneys to facilitate the notice and settlement administration process, and to provide information
7 that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate.
8 Further, if any individuals who are potential class members contact me, I will take steps to have
9 them referred to the Court-appointed settlement administrator so that these individuals may receive
10 the necessary information and notice they may be eligible to receive in connection with the
11 settlement and contemplated final approval hearing.

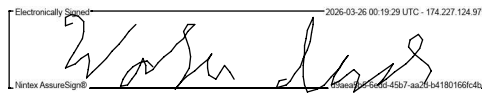
12 7. I believe that I have done everything that my attorneys have asked of me and have
13 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
14 members and the State of California with respect to aggrieved employees. I have volunteered to
15 represent and champion the interests of many other people with similar claims and injuries because
16 of the importance of the case and the necessity that all class members and aggrieved employees
17 benefit from the lawsuit equally. I understand that as a proposed class representative, and if
18 formally appointed as a class representative, I have and continue to represent the interests of all
19 members of the class in litigation to recover relief for the class. As an hourly-paid employee of
20 Defendant who was subject to the same policies, practices, and procedures as the other members
21 of the class, I have claims that are typical of those of the class. I consider the interests of the class
22 just as I would consider my own interests. I understand that I may need to put the interests of the
23 class before my own interests, although I have no reason to believe that my interests are in conflict
24 with the interests of the class. I understand that any resolution of the lawsuit is subject to court
25 approval and must be in the best interest of the class as a whole. I have participated, and continue
26 to participate, in the lawsuit as necessary. I have actively followed and monitored the progress of
27 the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the skilled and
28 effective attorneys that I have retained.

1 8. I believe my efforts helped to get the result obtained in this matter, and as a potential
2 class and PAGA representative, I respectfully request that the Court award me an enhancement
3 award for my efforts in pursuing and participating in this matter. Taking into consideration the
4 time that I have dedicated to this matter, I believe that this amount is reasonable.

5 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct.

8 Executed on March 25, 2026 at Redlands, California

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10 An electronic signature box containing a handwritten signature. Above the signature, it says "Electronically Signed". To the right, it shows a timestamp: "2026-03-26 00:19:29 UTC - 174.227.124.97". Below the signature, it says "Wafa Mowannes".

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