

[Counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

Coordination Proceeding
Special Title (Rule 3.550)

RCSH WAGE AND HOUR CASES

Included Actions:

*Eddie Castillo, et al. v. RCSH Operations, Inc.,
et al.*, San Francisco County Superior Court
Case No. CGC-21-594237

Eddie Castillo v. RCSH Operations, Inc., et al.,
Los Angeles County Superior Court Case
No. 21SMCV01530

*Adrian Quiroz Guerrero, et al. v. Ruth's
Hospitality Group, Inc.*, Riverside County
Superior Court Case No. RIC1804127

*Amanda M. Patterson v. RCSH Operations,
Inc.*, Contra Costa County Superior Court
Case No. MSC21-02077

Case No.: JCCP5243

Honorable Harold W. Hopp
Department 1

CLASS ACTION

**DECLARATION OF LUCAS MARTIN
AREL IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: July 11, 2024
Time: 8:30 a.m.
Department: 1

<i>Castillo</i> Complaint Filed:	July 29, 2021
<i>Castillo</i> PAGA Complaint Filed:	Sept. 17, 2021
<i>Patterson</i> Complaint Filed:	Oct. 20, 2021
<i>Guerrero</i> Complaint Filed:	Feb. 26, 2018
Trial Date:	None Set

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DECLARATION OF ANTON KAASA

I, Lucas Martin Arel, declare and state as follows:

1. I submit this declaration in support of Class Action and PAGA Settlement.

2. I am over the age of eighteen and currently a resident of Riverside, California.

3. This declaration is based upon my personal knowledge, and if called as a witness, I could and would competently testify regarding the statements in this Declaration.

4. I was employed as a cook by Defendant Ruth's Hospitality Group, Inc. from approximately 2018 to 2019 at their San Francisco location.

5. Throughout the course of my employment, my colleagues and I believed that, among other things, were not provided proper meal and rest breaks in accordance with California laws, were not provided accurate payroll records, and in some instances, were not timely paid all wages earned upon termination of our employment.

6. When I found out that there was a class action lawsuit pending against Defendant for various labor code violation, I contacted Mr. Srourian, one of the lawyers representing the former and current employees, to make myself available to help any way I can. After several conversations with Mr. Srourian, I agreed to become a class representative in the lawsuit.

7. As part of my role as a class representative, I performed numerous tasks to aid and further the prosecution of this action. I spent considerable time going through all of my personal belongings and computer files to gather any relevant employment documents that I thought would assist my lawyers in prosecuting the class claims. I also helped my lawyers conduct discovery – both providing discovery responses, as well as assisting my lawyers with specific questions to ask and areas to investigate. Furthermore, I helped my lawyers prepare for the 2022 mediation, and I ultimately reviewed the terms of settlement to make sure it was fair to the class. I also maintained regular contact with my lawyers Mr. Srourian and Mr. Sirmabekian.

8. As a result of years long litigation, and multiple mediations, and after discussing the risks, benefits, and alternatives of continued litigation, I, along with my lawyers, agreed to settle the case for \$6,000,000.00 on behalf of all of the Class Members, who were similarly employed by Defendants during the relevant statutory period.

11. I could have chosen to pursue my claims individually, but instead chose to pursue this action as a class action. In doing so, I suffered adverse consequences in that my own recovery was delayed.

13. However, I also assumed risks by agreeing to this lawsuit and having my name be included in this lawsuit. In addition, in settling this lawsuit, I also agreed to the release language contained in the Settlement Agreement.

15. I am not a named class representative in any other case, pending or closed.

17. I understand that my counsel has respectfully requested that I be awarded a class representative Enhancement Award of \$25,000.00 for my work as class representatives in this matter. I respectfully believe that this amount is fair and reasonable because of the significant result we recovered on behalf thousands of employees, and for the time I spent assisting my lawyers on this case for approximately seven years.

DocuSigned by:

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