

[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 ADRIAN QUIROZ
GUERRERO 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 ADRIAN QUIROZ GUERRERO

I, Adrian Quiroz Guerrero, 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. at Defendant's Palm Desert location from approximately 2002 to 2017, for a total of approximately 15 years.

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. As a class representative, I have been involved with this litigation since its inception. As part of my role as a class representative, I performed numerous tasks to aid and further the prosecution of this action. At the start of the case, 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. From there, I helped my lawyers conduct discovery – both providing discovery responses, as well as assisting my lawyers with specific questions to ask and areas to investigate. I then attended in-person mediation in 2019, which was unsuccessful, because of my willingness to turn down Defendant's generous offers to abandon class claims and settle individually.

7. After the first mediation was unsuccessful, I continued to assist my attorneys with discovery. I helped answer questions and provide insight in preparation for their taking of the deposition of my old boss Dale Brandsberg. After Mr. Brandsberg's deposition was taken, I was prepped for my deposition, which took place the following day.

8. Throughout the entire process, I spent time regularly keeping in contact with my lawyers via phone, text, and email. Additionally, I spent time responding to phone calls from

multiple former co-workers and other class members to answer questions they had about the lawsuit.

9. When this case was ultimately resolved, I spent time reviewing the terms of settlement in conjunction with discussions with my lawyers to make sure it was fair to the class. 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.

10. Following settlement, I spent additional time answering questions from other Class Members about the settlement process.

11. I estimate that I spent approximately 100 hours performing the above-described tasks.

12. 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. By actively pursuing this action as a class action, I have benefited by furthering the California public policy goal of enforcing the State's wage and hour laws. Further, I assisted in putting money into the pockets of several thousand California employees.

14. I did not incur any out-of-pocket expenses in pursuing this action.

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

16. There are no related individual claims being released by me in conjunction with this Settlement.

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, for the time I spent assisting my lawyers on this case for approximately seven years, and for refusing to settle this case on an individual basis and selling out the class.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on 6/17/2024, at Riverside, California.

3 DocuSigned by:
4 Adrian Quiroz
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5 Adrian Quiroz Guerrero