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Attorneys for Defendants
RCSH OPERATIONS, INC.
And RUTH'S HOSPITALITY GROUP, INC.

**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

[Assigned for All Purposes to
Hon. Harold Harold W. Hopp, Dept. 1]

CLASS ACTION

**DECLARATION OF MARCY JOHNSON
RE: PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

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

DECLARATION OF MARCY JOHNSON

I, Marcy Johnson, declare as follows:

1. I am over 18 years of age. The following information is true and of my own knowledge. If called as a witness, I could and would competently testify thereto. I am an Operations HR Manager for Defendants RCSH OPERATIONS, INC. And RUTH'S HOSPITALITY GROUP, INC. ("Defendants" and/or "RCSH" and "RHG").

2. In my role as Operations HR Manager, and in the normal course and scope of my duties, I have access to, and regularly do access, RCSH's and RHG's employee records for both current and former employees as well as other corporate and business records related to hiring and retaining employees. Personnel documents and other employee records are maintained in the ordinary course of RCSH's and RHG's business and reflect true and correct copies of documents created or acknowledged by employees or other persons with a business duty to do so, with personal knowledge of the records or events stated therein, and at or near the time of the events reflected therein.

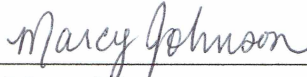
3. Based on my knowledge of RCSH's and RHG's hiring practices, all current employees are over the age of 18, and I am informed and believe that all current and former hourly and/or non-exempt employees working for Defendants in California between February 26, 2014 and the present (the "Putative Class Members"), were at least 18 in order to be hired. Defendants do not hire minors to work in their restaurants. In terms of the education level of the Putative Class Members, Defendants do not compile or track this information in their human resources information systems; however, in order to work in the fine dining establishments operated by Defendants, individuals must be sufficiently literate to apply for, obtain and retain employment with Defendants. In addition, the parties have agreed to have the notice of class action settlement that will be distributed to settlement class members translated into Spanish because a meaningful number of Class Members are believed to be native Spanish speakers.

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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. Executed on October 5, 2023, at Ramona, California.

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4 
5 Marcy Johnson