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7 Attorneys for Plaintiff  
8 Savanna Halliwell

9 **SUPERIOR COURT OF CALIFORNIA**  
10 **COUNTY OF SANTA CRUZ**

11 SAVANNA HALLIWELL, ) CASE NO.  
12 )  
13 Plaintiff, ) **DECLARATION OF [REDACTED]**  
14 ) **[REDACTED]**  
15 v. )  
16 )  
17 EMILY REILLY; ROBERT NAHAS; and )  
18 EMILY’S GOOD THINGS TO EAT, )  
19 a California Corporation; and DOES 1-20, )  
20 )  
21 Defendants. )

22 I, [REDACTED], declare:

- 23 1. All of the facts in this declaration come from my personal knowledge, except for those  
24 stated on information and belief and as to those facts I believe them to be true. If called upon to  
25 testify in a court of law, I could, and would, competently testify to the facts in this declaration.
- 26 2. I worked at Emily’s Good Things To Eat (“Emily’s Bakery”) for about 16 months from  
27 2010-2011. I worked under the direct supervision of Robert Nahas.
- 28 3. During the time I worked at Emily’s Bakery, I witnessed Robert Nahas act  
inappropriately toward some of the female employees, including talking to them inappropriately  
about their boyfriends, following them around the bakery, hugging them, and touching them.
4. If a female employee was not one of Robert’s favorites, he would use bullying tactics,  
to belittle and humiliate the employee. I would not be charming to appease Robert Nahas when I

1 worked at Emily's Bakery, and he belittled me and brought me to tears and humiliation in front  
2 of customers over trivial mistakes. He would use his power as my supervisor to demean me.

3 5. One night while I was working there, there was a birthday celebration for a female  
4 employee after the Bakery closed to the public. Robert Nahas got extremely intoxicated, hugged  
5 female employees for prolonged amounts of time, and mumbled inappropriate remarks to some  
6 of the female employees that were there.

7 6. It was not unusual for Robert Nahas to drink heavily. One day at work Robert Nahas  
8 had scratches down his face and bragged to me and other employees that he had gotten really  
9 drunk and had passed out in the street in front of Emil's Bakery the night before, and that people  
10 were having to step over him to get by.

11 7. I was told by co-workers that a female employee named [REDACTED] made sexual harassment  
12 claims against Robert Nahas shortly before I began my employment for Emily's Bakery. I am  
13 not aware of any changes that Emily's Bakery put in place as a result of the sexual harassment  
14 complaints they received from [REDACTED]. I am not aware of any steps that Emily's Bakery took to  
15 prevent further sexual harassment by Robert Nahas.

16  
17 I declare under penalty of perjury under the laws of the State of California that the foregoing  
18 is true and correct, and that this declaration was executed in [REDACTED], Texas on [REDACTED], 2015.

19  
20  
21 BY: \_\_\_\_\_  
22 [REDACTED]

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21 Defendants. )

CASE NO.

DECLARATION OF [REDACTED]  
[REDACTED]

22 I, [REDACTED], declare:

- 23 1. All of the facts in this declaration come from my personal knowledge, except for those  
24 stated on information and belief and as to those facts I believe them to be true. If called  
25 upon to testify in a court of law, I could, and would, competently testify to the facts in  
26 this declaration.
- 27 2. I worked at Emily’s Good Things To Eat (“Emily’s Bakery”) from approximately  
28 September 2010 to January 2011. I worked under the direct supervision of Robert Nahas.
3. When I first started working at Emily’s Bakery, my supervisor, Robert Nahas, tried to  
get me to let him hug me, tried to get affection from me, and pushed his body up against mine  
and put his arms over me when he was trying to teach me how to work the register. I made sure  
that he knew that I was disgusted if he got too close and rejected all sexually harassing advances  
he made.

1           4. Once Robert Nahas understood that I would not put up with his sexually harassing  
2 behavior, he began to mistreat me. He began constantly yelling at me and blaming me for things  
3 that went wrong at the bakery that were not my fault.

4           5. Emily's Bakery opened up a kiosk on the UC Santa Cruz campus shortly thereafter, and  
5 I got to work at the kiosk, away from Robert Nahas's harassment.

6           6. Once I was away from Robert Nahas, I reported to Emily Reilly that Robert Nahas was  
7 mean to me and yelled at me all the time because I would not return his flirtations or give him  
8 hugs. Emily Reilly replied by telling me that he just has a bit of a temper, and that everything  
9 was fine. She made excuses for Robert Nahas no matter what I told her about his behavior. I am  
10 not aware of any investigation that was performed regarding my complaint. I am not aware of  
11 any steps that were taken to prevent further sexual harassment after I complained.

12           7. I was wrongfully terminated from Emily's Bakery because I rejected Robert Nahas's  
13 sexually harassing behavior. Emily's Bakery decided to discontinue having an employee work at  
14 the kiosk, and so I expected to be transferred back to the Emily's Bakery location, where I  
15 started my employment. Because that would mean working directly with Robert Nahas, I was  
16 planning to quit my job. However, before I had a chance to quit, a manager named [REDACTED] called  
17 me in for a meeting and told me that she had spoken with Robert and that it was "not working  
18 out" to have me at the bakery, so they were going to have to let me go.

19           8. I witnessed Robert Nahas sexually harass new attractive female hires. His sexually  
20 harassing behavior toward new hires included being overly flirtatious, batting his hand at female  
21 employees' shoulders, touching female employees' hair, asking female employees for hugs  
22 before they left the bakery, and asking female employees personal questions such as questions  
23 about their boyfriends and where they liked to socialize. I also witnessed Robert Nahas ask  
24 employees out for drinks, and ask female employees to go to the bar with him to play pool.

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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, and that this declaration was executed in Santa Cruz, CA on \_\_\_\_\_, 2015.

BY: \_\_\_\_\_

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21 Defendants. )

CASE NO.

DECLARATION OF [REDACTED]

22 I, [REDACTED], declare:

- 23 1. All of the facts in this declaration come from my personal knowledge, except for those  
24 stated on information and belief and as to those facts I believe them to be true. If called  
25 upon to testify in a court of law, I could, and would, competently testify to the facts in  
26 this declaration.
- 27 2. I worked at Emily’s Good Things To Eat (“Emily’s Bakery”) for several years, ending  
28 in or about 2005. I was a manager. I worked under the direct supervision of Robert Nahas.
3. Robert Nahas sexually harassed me. He made inappropriate sexual comments to me.  
One example is when he told me that people would come to Emily’s Bakery if I were naked.
4. While I was working at Emily’s Bakery in the upstairs office, Robert Nahas locked the  
office door and screamed at me and would not let me out. I also witnessed Robert Nahas made  
other female employees cry.

1           5. I told Robert Nahas that his behavior was inappropriate. I also complained to Emily  
2 Reilly about Robert Nahas's sexual harassment. I told Emily Reilly that Robert Nahas should be  
3 gone from Emily's Bakery, and she told me that he was going to stay. Emily Reilly told me to  
4 do what I needed to do to make myself feel oaky. She said if that was leaving the job, then to go,  
5 and that if it was filing a lawsuit, to file one.

6           6. After I complained to Emily Reilly about Robert Nahas's behavior, his behavior got  
7 worse. I quit on a day that Robert Nahas was yelling at me because I could not take his abusive  
8 behavior any longer.

9           7. I filed a complaint with a California agency that investigates sexual harassment. I  
10 believe it was the California Department of Fair Employment and Housing. They opened an  
11 investigation into my sexual harassment complaints, which Emily Reilly and Robert Nahas were  
12 aware of.

13           8. I am not aware of any actions taken by Emily's Bakery, Emily Reilly, or Robert Nahas  
14 to prevent further sexual harassment at Emily's Bakery in response to my sexual harassment  
15 complaints.

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17           I declare under penalty of perjury under the laws of the State of California that the foregoing  
18 is true and correct, and that this declaration was executed in [REDACTED], NY on August [REDACTED],  
19 2015.

20  
21           \_\_\_\_\_  
22           [REDACTED]

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CASE NO.

DECLARATION OF [REDACTED]

22 I, [REDACTED], declare:

- 23 1. All of the facts in this declaration come from my personal knowledge, except for those  
24 stated on information and belief and as to those facts I believe them to be true. If called  
25 upon to testify in a court of law, I could, and would, competently testify to the facts in  
26 this declaration.
- 27 2. I worked at Emily’s Good Things To Eat (“Emily’s Bakery”) from approximately  
28 2008-2011. Robert Nahas was my supervisor.
3. Robert Nahas would routinely and repeatedly ask me for hugs before I left work and  
would be physically too close to me at work. He also initiated inappropriate conversations with  
me nearly every day that I worked with him. Robert Nahas also repeatedly invited me to go on  
expense-paid trips with him.
4. Robert Nahas told me on more than one occasion that he did not get physical attention  
from his wife, Emily Reilly, and that he therefore had to find physical attention elsewhere.



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24 stated on information and belief and as to those facts I believe them to be true. If called  
25 upon to testify in a court of law, I could, and would, competently testify to the facts in  
26 this declaration.
- 27 2. I worked at Emily’s Good Things To Eat (“Emily’s Bakery”) approximately 7-8 years  
28 ago. Robert Nahas was my supervisor.
3. Robert Nahas sexually harassed me while I worked at Emily’s Bakery. I was always  
made to feel very uncomfortable by Robert Nahas. Robert Nahas often inappropriately brushed  
up against me and other female employees in their late teens to early twenties. Robert Nahas  
also would often touched the small of our backs. He also would often ask us for hugs. Robert  
Nahas flirted with me while I was employed at Emily’s Bakery and I witnessed him flirt with  
other young female employees.

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4. Robert Nahas generally hired young females to work at Emily's Bakery, aside from some male employees that worked in the back.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed in [REDACTED], CA on [REDACTED], 2015.

\_\_\_\_\_  
[REDACTED]

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CASE NO.  
**DECLARATION OF** [REDACTED]  
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24 stated on information and belief and as to those facts I believe them to be true. If called  
25 upon to testify in a court of law, I could, and would, competently testify to the facts in  
26 this declaration.
- 27 2. I worked at Emily’s Good Things to Eat (“Emily’s Bakery”) in or about 2008 while I  
28 was in college. I worked under the direct supervision of Robert Nahas.
3. Robert Nahas sexually harassed me while I worked at Emily’s Bakery. He would block  
the back entry door to the Bakery until he got a hug from me, he repeatedly asked for hugs, and  
he would ask me personal questions about me and my boyfriend at the time.
4. On two separate occasions Robert Nahas gave me a \$100 bill as an apology to me for  
asking me personal questions.

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5. Robert Nahas made it clear to the staff, including me, that he had a crush on a female employee named [REDACTED] who was younger than me.

6. I was forced to quit my job at Emily's Bakery because of Robert Nahas's behavior. On Halloween, Robert Nahas called my cell phone and asked me if I wanted to hang out with him. I said no. Later that evening, I was stranded at a party in Santa Cruz. I knew that Robert Nahas had a car, and I called him to ask him if he could pick me up and drive me home. Robert Nahas came and picked me up and said he would drive me home, but when we got to my house he kept driving. I became distressed and told him I wanted to go home and eventually just had him pull the car over and I got out. The next day I called Emily's Bakery and told Robert Nahas that the night before had crossed boundaries and that I had to quit. I was seriously upset, distressed, and disturbed by Robert Nahas's behavior and talked about this incident with my friends and family at the time.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed in [REDACTED], New York on August , 2015.

---

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25 upon to testify in a court of law, I could, and would, competently testify to the facts in  
26 this declaration.
- 27 2. I worked at Emily’s Good Things To Eat (“Emily’s Bakery”) from in or about 2008 to  
28 2011 when I was attending college at UC Santa Cruz. I worked under the direct supervision of  
Robert Nahas.
3. During the time I worked at Emily’s Bakery, I was told by one of my female co-  
workers that Robert Nahas had showed up at her house late at night wanting to hang out with  
her. She said that on other nights she had received unwanted calls from Robert Nahas in the  
middle of the night.

