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Attorneys for Plaintiffs Deisy Salas, Kristal Carmona, Israel Linthrop, Alicia-Krueger-Aguirre, and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

DEISY SALAS, KRISTAL CARMONA,
ISRAEL LINTHROP, ALICIA KRUEGER-
AGUIRRE, 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;

Plaintiffs,

v.

J & S RESTAURANTS, INC., a California
corporation; TOPP END ENTERPRISES,
INC., a California corporation; VALENCIA
TPP, a general partnership; YEASTIE
BOYS, a general partnership; and DOES 1
through 100, inclusive,

Defendants.

THEODORE CHRISTOPHER MILLER,
NOLAN MALONE, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiffs,

v.

VENTURA COUNTY RESTAURANT
SERVICES INC. DBA TOPPERS PIZZA
PLACE, a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Lead Case No.: 56-2019-00526959-CU-
OE-VTA (*Salas* Action)
(*Consolidated with 56-2020-00546726-
CU-OE-VTA*)

Honorable Henry J. Walsh
Department 42

CLASS ACTION

**DECLARATION OF ALICIA
KRUEGER-AGUIRRE IN SUPPORT
OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT,
ATTORNEY'S FEES, COSTS, AND
ENHANCEMENT PAYMENTS**

[Notice of Motion and Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payments; Declaration of Class Counsel (Edwin Aiwazian, Zack Broslavsky, Jonathan A. Weinman, and Dennis Hyun); Declarations of Class Representatives (Deisy Salas, Kristal Carmona, Israel Linthrop, Theodore Christopher Miller, and Nolan Malone); Declaration of Settlement Administrator (Taylor Mitzner); and [Proposed Final Approval Order and Judgment filed concurrently herewith]

Date: April 4, 2022
Time: 8:30 a.m.
Department: 42

Salas Complaint Filed: March 29, 2019
Salas FAC Filed: August 2, 2019
Salas SAC Filed: November 7, 2019
Salas TAC Filed: October 29, 2020
Miller Complaint Filed: August 5, 2019
Miller FAC Filed: September 29, 2020
Trial Date: None Set

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1 4. Since joining the case, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to
3 them as quickly as possible and gave them as much information and identified as many
4 documents as I could. I spent at least 11 additional hours speaking with my attorneys about the
5 case, identifying potential witnesses, providing my attorneys with documents and information
6 concerning the case, and also describing policies, practices, and procedures of Toppers Pizza
7 Place.

8 5. As far as the settlement is concerned, I was available to review documents and
9 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
10 agreement, about 2 hours asking questions and discussing the potential settlement with my
11 attorneys before signing the settlement agreement, and about 2 hours monitoring the progress of
12 the settlement.

13 6. I believe that I have done everything that my attorneys have asked of me and have
14 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
15 and the State of California. I think my efforts helped to get the result obtained in this case, and
16 as a class and PAGA representative, I respectfully request that the Court award me an
17 enhancement payment in the amount of \$10,000.00 for my active participation in this case.
18 Taking into consideration the time that I have dedicated to furthering this case, I believe that this
19 amount is reasonable.

20 7. I am not related to anyone associated with Lawyers *for* Justice, PC, Broslavsky &
21 Weinman, LLP, or Hyun Legal, APC.

22 8. I have not entered into any undisclosed agreements, nor have I received any
23 undisclosed compensation in this case. The only compensation I will receive is whatever amount
24 the Court awards as an enhancement payment, as well as an individual settlement payment.

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

03/07/2022

27 Executed this _____ day of March 2022, at Somis, California.

28 
A digital signature block containing a handwritten signature and a long alphanumeric hash.

Alicia Krueger-Aguirre