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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE**

OSVALDO MARTINEZ, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General Act;

Plaintiff,

vs.

THE MOCHI ICE CREAM COMPANY., a
California Corporation; THE MOCHI ICE
CREAM COMPANY, LLC, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 20STCV44789

Honorable Mark V. Mooney
Department 68

**DECLARATION OF OSVALDO
MARTINEZ IN SUPPORT OF
PLAINTIFF’S MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LAB. CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS’ FEES AND
LITIGATION COSTS, ENHANCEMENT
AWARD, AND ADMINISTRATION
COSTS**

[Notice of Motion and Motion for Approval
Settlement; Declaration of Proposed Class
Counsel (Annabel Blanchard); and
[Proposed] Order filed concurrently
herewith]

Date: May 18, 2023
Time: 8:30 a.m.
Department: 68

Complaint Filed: November 20, 2020
Trial Date: None Set

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1 information concerning the case, and also describing policies, practices, and procedures of
2 Mochi Ice Cream. During the discovery phase of the litigation, I spent approximately 7
3 additional hours reviewing Mochi Ice Cream's discovery requests, locating documents, and
4 providing documents, and responses, to my attorneys.

5 5. As far as the settlement is concerned, I spent about 2 hours reviewing the
6 settlement agreement and about 4 hours asking questions and discussing the potential settlement
7 with my attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
10 California. I think my efforts helped to get the result obtained in this case, and as a PAGA
11 representative, I respectfully request that the Court award me an enhancement award in the
12 amount of \$7,500.00 for my active participation in this case. Taking into consideration the time
13 that I have dedicated to this case, I believe that this amount is reasonable.

14 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as an enhancement award, as well as my share of the settlement as an aggrieved
18 employee.

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

08/15/2022

21 Executed this ____ day of August 2022, at Moreno Valley, California.

22 
23 Electronically Signed 2022-08-16 01:41:45 UTC - 174.195.194.17
Nintex AssureSign® a5624572-c080-4af2-95d3-aef20172c11e

Osvaldo Martinez