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

KRYSTAL CAMINA, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

WOK IN THE PARK LLC, a California
limited liability company; CAFETERIA
15L, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Lead Case No. 34-2020-00283344-CU-OE-
GDS

Consolidated with Case No. 34-2020-
00289018

Honorable Lauri A. Damrell
Department 22

**DECLARATION OF KRYSTAL CAMINA
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: March 14, 2025
Time: 9:00 a.m.
Department: 22

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

Plaintiff,

vs.

WOK IN THE PARK LLC, a California
limited liability company; CAFETERIA 15L,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Class Complaint Filed: August 12, 2020
PAGA Complaint filed: November 17, 2020
Trial Date: None Set

DECLARATION OF KRYSTAL CAMINA

I, **Krystal Camina**, hereby declare as follows:

1. I am over 18 years of age and a resident of Arizona. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendants Wok in the Park, LLC and Cafeteria 15L (together, "Defendants") as an hourly-paid, non-exempt employee, from approximately April 2019 to June 2019. I decided to seek legal advice about my experience working for Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Defendants were held accountable for not properly compensating employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading employment law firms in California for approximately 3 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for approximately 8 hours to discuss my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to potentially be a named plaintiff, class representative, and PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a class representative, and also, if class certification were to be obtained, what my duties and responsibilities would be in that event.

3. I have spent over 11 hours communicating with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering their questions, providing guidance regarding the work performed by other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I frequently checked in with my attorneys and their staff to make sure that they had my most current information and to provide them with any additional information

1 that I had obtained.

2 4. Throughout the case, I was available to answer any questions my attorneys had,
3 and available to speak and meet with them whenever they needed me. I responded to my
4 attorneys as quickly as possible and gave them as much information and identified as many
5 documents as I could. I spent at least 7 additional hours speaking with my attorneys about the
6 case, identifying potential witnesses, providing my attorneys with documents and information
7 concerning the case, and describing the policies, practices, and procedures of Defendants. Also,
8 as described below in Paragraph 7, I spent additional hours participating in the discovery
9 process.

10 5. As far as the settlement is concerned, I was available to review documents and
11 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement papers
12 and about 1 hour asking questions and discussing the potential settlement with my attorneys
13 before signing the settlement papers.

14 6. I understand that a settlement has been reached in my case and what my duties
15 and responsibilities are as a class and PAGA representative. For example, I am aware that if the
16 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,
17 and likely appoint me as the representative of the class and my attorneys as counsel for the class.
18 I also understand that my duties will include checking in on, monitoring, and conferring with my
19 attorneys and counsel for the class to facilitate the notice and settlement administration process,
20 and to provide information that the Court needs to assess whether the settlement is fair,
21 reasonable, and adequate. Further, if any individuals who are potential class members contact
22 me, I will take steps to have them referred to the Court-appointed settlement administrator so that
23 these individuals may receive the necessary information and notice they may be eligible to
24 receive in connection with the settlement and contemplated final approval hearing.

25 7. I believe that I have done everything that my attorneys have asked of me and have
26 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
27 members and aggrieved employees. I have volunteered to represent and champion the interests
28 of many other people with similar claims and injuries because of the importance of the case and

1 the necessity that all class members and aggrieved employees benefit from the lawsuits equally.
2 I understand that as a proposed class representative, and if formally appointed as a class
3 representative, I have and continue to represent the interests of all members of the class in
4 litigation to recover relief for the class. I have claims that are typical of those of the class,
5 consider the interests of the class just as I would consider my own interests and understand that I
6 may need to put the interests of the class before my own interests. I have and continue to
7 actively participate in the lawsuit, as necessary, by, among other things, engaging in the
8 discovery process by responding to multiple sets of discovery requests propounded on me by
9 Defendants (specifically, Form Interrogatories-Employment (Set One), Form Interrogatories-
10 General (Set One), Requests for Admission (Set One), Requests for Production of Documents
11 (Set One), and Special Interrogatories (Set One)) and giving oral testimony at my deposition
12 (which was taken on December 15, 2021, lasted approximately 8 hours, and for which I spent
13 approximately 2 hours preparing)), and if required, I will provide trial testimony. I understand
14 that any resolution of the lawsuit is subject to court approval, and must be in the best interest of
15 the class as a whole. I have also actively followed and monitored, and continue to follow and
16 monitor, the progress of the lawsuit, and have taken steps to make sure, and continue to make
17 sure, that the litigation is prosecuted by the skilled and effective attorneys that I have retained. I
18 believe that I have no interests which are inconsistent with the interests of the class and that I
19 have, and will continue to, adequately represent the class.

20 8. I think my efforts helped to get the result obtained in this case, and as a potential
21 class and PAGA representative, I respectfully request that the Court approve and award me an
22 enhancement payment in the amount of \$10,000.00 for my efforts and active participation in this
23 case, as well as my broader release of claims. Taking into consideration the time that I have
24 dedicated to this case, I believe that this amount is reasonable.

25 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

26 10. I have not entered into any undisclosed agreements, nor have I received any
27 undisclosed compensation in this case. The only compensation I will receive is whatever amount
28 the Court awards as an enhancement payment, as well as my share of the settlement fund as a

class member and aggrieved employee.

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

Executed on 07/10/2024, at El Mirage, Arizona.

Electronically Signed 2024-07-11 00:20:59 UTC - 174.74.206.234
Krystal Camina
Nintex AssureSign® ee1ad554-b751-4db7-bad6-b1aa000295c2

Krystal Camina