

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

TREVOR JOHNSON, 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,

Plaintiff,

v.

RENAUD'S BAKERY AND BISTRO, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 19STCV35046

Honorable Carolyn B. Kuhl
Department SSC12

CLASS ACTION

**DECLARATION OF TREVOR
JOHNSON IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES,
COSTS, AND ENHANCEMENT AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Award; Declaration of Class Counsel (Edwin
Aiwasian); Declaration of Settlement
Administrator (Taylor Mitzner); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: June 28, 2022
Time: 10:30 a.m.
Department: SSC12

Complaint Filed: October 2, 2019
FAC Filed: January 14, 2022
Trial Date: None Set

DECLARATION OF TREVOR JOHNSON

I, **Trevor Johnson**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. 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 Defendant Renaud's Bakery and Bistro, Inc. ("Renaud's Bakery") in an hourly-paid, non-exempt position from approximately July 2017 to October 2017. I decided to seek legal advice about my work experiences with Renaud's Bakery and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Edwin Aiwarzian. I wanted to do whatever I could to make sure Renaud's Bakery was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour, class action, and representative lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 6 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 5 hours discussing my situation, complex wage-and-hour class and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff and class representative and eventually, a PAGA representative.

3. I have spent over 16 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Renaud's Bakery, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Renaud's Bakery. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had, and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as

possible, gave them all the information I had, and identified as many documents as I could. I spent at least 11 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing the policies, practices, and procedures of Renaud's Bakery.

5. As far as the settlement is concerned, I was available to review the settlement documents and answer any questions my attorneys had. I spent about 3 hours reviewing the settlement agreement and about 2 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the results obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me an enhancement award in the amount of \$6,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

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

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

Executed on November 12, 2020, at Fullerton, California.

An electronic signature of Trevor Johnson, consisting of a stylized cursive script, enclosed within a rectangular digital signature box. The box contains technical metadata at the top and bottom.

Trevor Johnson