

KINGSLEY & KINGSLEY, APC
ERIC B. KINGSLEY, Esq., Cal. Bar No. 185123
eric@kingsleykingsley.com
KELSEY M. SZAMET, Esq., Cal. Bar No. 260264
kelsey@kingsleykingsley.com
16133 Ventura Blvd., Suite 1200
Encino, CA 91436
Telephone: (818) 990-8300
Fax: (818) 990-2903

Attorneys for Plaintiff and the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

HELEN SANTOS, an individual, on behalf of
herself and others similarly situated

PLAINTIFF,

v.

AIR CULINAIRE WORLDWIDE, LLC; and
DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 20STCV40648

[Case Assigned for All Purposes to Hon.
William F. Highberger in Dept. 10]

**DECLARATION OF HELEN SANTOS IN
SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: May 3, 2023

Time: 11:00 AM

Dept.: 10

Complaint Filed: October 23, 2020

Trial Date: None Set

DECLARATION OF HELEN SANTOS

I, HELEN SANTOS, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I worked as a non-exempt, hourly employee for AIR CULINAIRE WORLDWIDE, LLC (“Defendant” or “Air Culinaire”).

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that Air Culinaire failed to pay wages and/or overtime, failed to provide meal and rest breaks, did not provide accurate itemized wage statements, and failed to pay all wages due at the time of resignation/termination to me and other employees.

4. I understand that I am representing other employees and I believe that I am able to represent them well. I am happy that I have been able to represent other employees who worked in the same circumstances and who may not have felt comfortable stepping forward.

5. I first researched experienced attorneys who are very experienced with these types of lawsuits. It was very important to me to find attorneys with a lot of experience with these types of employment lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The class action lawsuit was filed on October 23, 2020.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys’ various communications regarding this matter, attending a full-day mediation on October 22, 2021; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

7. I estimate the total time spent in connection with this matter is approximately 35-

1 45 hours.

2 8. I have worked to actively represent the other Class Members and their interests.

3 9. I have always kept the Class Members interests at heart in this litigation.

4 10. I am prepared to continue assisting with this litigation and am committed to
5 achieving the best possible results for the Class.

6 11. I believe that the class action settlement obtained on behalf of the Class is fair and
7 reasonable in light of the issues involved in this case. As mentioned above, I reviewed and
8 discussed the Settlement Agreement with my attorneys and asked them questions about it to ensure
9 that I understood its terms and what it would mean for all of the class members.

10 12. I believe that I have fairly represented the absent Class and request that the Court
11 finally approve this settlement and confirm me as Class Representative.

12 13. I am not aware of any conflicts of interest that prevent me from being confirmed as
13 Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other
14 member of the firm that is representing me. I have no business dealings or other involvement
15 beyond this lawsuit and this representation. I have not been promised any money or inducement
16 to serve as Class Representative in this Lawsuit.

17 14. It is my opinion that the settlement agreement provides for a fair and adequate
18 enhancement for me as a Class Representative, in the amount of \$5,000.00. I believe that this is
19 fair and reasonable in light of all of the work that I have performed in my role as Class
20 Representative. As Class Representative, I have actively participated in all stages of the litigation,
21 as detailed above, and have always maintained the best interests of the Class while performing my
22 Class Representative duties.

Executed this 23 day of March, 2023 at Richmond, California.

DECLARATION OF HELEN SANTOS IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 11, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF HELEN SANTOS IN SUPPORT OF FINAL APPROVAL OF CLASS ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

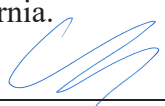
Clint D. Robison
Angeli C. Aragon
crobison@ohaganmeyer.com
aaragon@ohaganmeyer.com
O'Hagan Meyer
21550 Oxnard Street, Suite 1050
Woodland Hills, CA, 91367

[XX] (BY ELECTRONIC SERVICE) I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL THROUGH CASE ANYWHERE: On interested parties set forth on the attached service list.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 11, 2023, at Encino, California.



Michelle Tanzer