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Attorneys for Plaintiff Juan Salvador Villanueva,
individually, and on behalf of all other similarly
situated employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE COUNTY – CIVIL COMPLEX CENTER**

JUAN SALVADOR VILLANUEVA,
YESENIA BERMUDEZ, ISABEL HERRERA,
as individuals and on behalf of other similarly
situated employees,

Plaintiff,
vs.

LA CARRETA SUPERMARKETS, INC., a
California corporation, and DOES 1-50,
inclusive,

Defendant.

Case No.: 30-2020-01166375-CU-OE-CXC

Assigned for all purposes to:
Hon. Lon F. Hurwitz
Dept. CX 103

**DECLARATION OF PLAINTIFF
YESENIA BERMUDEZ IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: April 14, 2023
Time: 1:30 p.m.
Place: Department CX 103

DECLARATION OF YESENIA BERMUDEZ

I, Yesenia Bermudez, declare as follows:

1. I am over the age of eighteen and have personal knowledge of everything stated below and could competently testify to these facts if sworn.

2. I submit this Declaration in support of the motion for preliminary approval of class action settlement and class representative enhancement fee.

3. I worked for Defendants, (referred to herein as "Defendant"). As I worked for Defendants as an hourly worker during the class period, I worked very hard, especially when I worked above five and six hours and not able to take all of my entitled overtime wages, minimum wages, meal breaks and rest breaks. After my employment ended with Defendants, I determined that I would attempt to effectuate a change in Defendants' practices and policies through a class action.

4. After consulting with a law firm, I decided to join this class action against Defendant. I would consider myself a low wage hourly worker but despite this I still decided to take the risk of filing this class action and losing this case that could have exposed myself to certain attorneys' fees and costs incurred by Defendant. However, my passion to vindicate the rights of my coworkers outweighed the risk exposure to myself as I believed that my co-workers deserved to be treated fairly in the eyes of the law.

5. Throughout this case, I was required to appear at my attorneys' office, answering questions during several interviews by my attorney and his staff either in person or via telephone related to the case, and locating and submitting documents to my attorney in support of the claims.

6. I remained involved and provided information and details about Defendant's practices and policies in support of the class claims so that the claims could be maximized for the class members. Through the litigation I made myself available to complete the settlement agreement and finalize the terms of the settlement agreement and execute the settlement agreement.

7. In this litigation, I was committed throughout the entire process to ensure that the class members were treated fairly and committed approximately 30 hours to this case.

1 I declare under the penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on this 16th day of March, 2023 in Irvine, California.
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Yesenia Bermudez

Yesenia Bermudez, Declarant