

LIDMAN LAW, APC
Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Elizabeth Nguyen (SBN 238571)
enguyen@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
PATRICIA MEJIA DE GONZALEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

PATRICIA MEJIA DE GONZALEZ, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

GOLDEN BOLT, LLC, a California limited
liability company; GOLDEN HIPPO HOLDCO
INC., a California corporation; WHOLE BODY
RESEARCH, LLC, a California limited liability
company; and DOES 1 through 100, inclusive,

Defendants.

Case No. 21STCV02962

*[Assigned for All Purposes to Hon. Mark v.
Mooney]*

**DECLARATION OF PLAINTIFF
PATRICIA MEJIA DE GONZALEZ IN
SUPPORT OF PLAINTIFF'S MOTION
FOR SETTLEMENT APPROVAL OF
CLAIMS BROUGHT UNDER THE
PRIVATE ATTORNEYS GENERAL ACT
AND REASONABLE ATTORNEYS' FEES,
COSTS, AND ENHANCEMENT AWARD**

Date: March 21, 2022
Time: 8:30 a.m.
Dept.: 68

Complaint Filed: January 25, 2021
Trial Date: None Set

DECLARATION OF PATRICIA MEJIA DE GONZALEZ

I, PATRICIA MEJIA DE GONZALEZ, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed Private Attorneys General Act ("PAGA") settlement ("Settlement") reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. Golden Bolt LLC ("Golden Bolt" or "Defendant") manufactures and distributes nutritional supplements.

3. I have been employed by Golden Bolt since on or about March 29, 2016 until my separation. While working for Golden Bolt, I was subject to Golden Bolt's wage and hour practices.

4. I do not believe I was properly paid for all of my time worked. Specifically, I am informed and believe that Golden Bolt failed to include my Paid Lunch Awards in my regular rate for purposes of overtime, when I worked over 8.0 hours in a shift.

5. I do not believe I received all legally-compliant meal and rest breaks. Specifically, as a result of Golden Bolt's work demands and the requirement to be back at my work station at the end of my meal break, my meal breaks were either late, short, or otherwise unlawful. I was also not permitted to leave the work premises for my rest breaks. Despite, not receiving all of my legally required meal and rest breaks, I did not receive any meal and/or rest break premiums.

6. Additionally, I was required to wear protective gear but was not reimbursed by Golden Bolt for it. I also had to use my personal cellular phone and was not reimbursed for incurring these necessary business expenses.

7. As a result of these violations, I also do not believe I received accurate and complete wage statements.

8. I retained Haines Law Group, APC and Lidman Law, APC to represent me in my wage claims against Golden Bolt.

9. At the time of filing this lawsuit, I understood that this lawsuit had the chance to benefit my former co-workers and current employees of Golden Bolt by helping them recover their unpaid

1 penalties. As the named Plaintiff I knew that I would be taking on certain risks that the other employees
2 wouldn't have to bear. I knew that there was a risk that I could be liable for Golden Bolt's costs if we
3 lost the case. I accepted these risks because I wanted Golden Bolt to compensate its former employees
4 and to fix its pay practices. I also took on an added risk of filing a lawsuit as a current employee of
5 Golden Bolt and feared potential retaliation by Golden Bolt and/or its employees/

6 10. Even though I understood that joining a lawsuit is a public record and could stigmatize
7 me and may affect my future employability because employers do not like to hire employees who have
8 filed lawsuits against their prior employers, I accepted that burden for the benefit of other employees
9 of Golden Bolt. Indeed, if I had not sought legal representation to enforce California's labor laws, I
10 do not believe my former co-workers of Golden Bolt and California's Labor and Workforce
11 Development Agency ("LWDA"), which I understand receives a portion of the proposed settlement,
12 would receive any of these funds. Without counsel and my assistance, I do not believe we would have
13 gotten the proposed settlement.

14 11. After the lawsuit was filed, I continued to work closely with my lawyers. I worked
15 with my lawyers to prepare for the mediation and was available that day for any questions that arose.
16 I spent time discussing the proposed settlement with my attorneys. I wanted to understand everything
17 before I signed it. I believed I represented the aggrieved employees and the LWDA to the best of my
18 ability and put the interests of the aggrieved employees ahead of my own. I estimate that I have spent
19 10 to 15 hours on this case.

20 12. I understand that my attorneys will request that the Court award me an enhancement
21 award of \$5,000.00 for my service and efforts on the case. This proposed \$5,000.00 enhancement
22 award is not contingent upon me supporting the proposed Settlement.

23 I declare under penalty of perjury under the laws of the United States and state of
24 California that the foregoing is true and correct. Executed on February 16, 2022 at Encino, California.

25 *Patricia Mejia de Gonzalez*
Patricia Mejia de Gonzalez (Feb 16, 2022 13:29 PST)

26 Patricia Mejia de Gonzalez
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