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

CHRISTINA COCOTIS-ANDRADE,
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, NYCOLE TORRES, individually, and on
behalf of members of the general public
similarly situated;

Plaintiffs,

vs.

CARL ZEISS MEDITEC, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No. RG18927500

Honorable Michael Markman
Department 23

CLASS ACTION

**DECLARATION OF CHRISTINA
COCOTIS-ANDRADE IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, CLASS COUNSEL
ATTORNEYS' FEES AND EXPENSES,
AND CLASS INCENTIVE AWARD**

Date: February 27, 2025
Time: 10:00 a.m.
Department: 23

Complaint Filed: November 5, 2018
FAC Filed: December 27, 2018
SAC Filed: December 22, 2021
TAC Filed: May 3, 2024
Trial Date: None Set

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1 4. I was available to answer any questions my attorneys had, and available to speak
2 and meet with my attorneys whenever they needed me. I responded to them as quickly as
3 possible and gave them as much information and identified as many documents as I could. I
4 spent at least **12 additional hours** speaking with my attorneys about the case, identifying
5 potential witnesses, providing my attorneys with documents and information concerning the
6 case, and also describing policies, practices, and procedures of Carl Zeiss Meditec. During the
7 discovery phase of the litigation, I spent approximately **9 additional hours** reviewing Carl Zeiss
8 Meditec's discovery requests, locating documents, and providing documents, responses, and
9 supplemental responses to my attorneys.

10 5. As far as the settlement is concerned, I spent about **2 hours** reviewing the
11 settlement agreement and about **2 hours** asking questions and discussing the potential settlement
12 with my attorneys before signing the settlement agreement.

13 6. On February 7, 2022, I attended a deposition that lasted approximately **2.5**
14 **hours**. I spent at least **6 hours** preparing for the deposition. After the deposition, I spent at least
15 **2 hours** reviewing my testimony and discussing the contents of the deposition transcript with my
16 attorneys.

17 7. I believe that I have done everything that my attorneys have asked of me and have
18 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
19 and the State of California. I think my efforts helped to get the result obtained in this case, and
20 as a class and PAGA representative, I respectfully request that the Court award me an
21 enhancement payment in the amount of \$10,000.00 for my active participation in this case.
22 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
23 reasonable.

24 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

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

3 Executed on this day 07/11/2024, at Carlsbad, California.

4 Electronically Signed 2024-07-11 17:52:03 UTC - 108.64.14.15
Christina Andrade
5 Nintex AssureSign® 0a2b1285-b790-43aa-882b-b1a7016f1838

Christina Cocotis-Andrade