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Attorneys for Plaintiffs

**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,

v.

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

Defendants.

Case No.: RG18927500

Honorable Tara Desautels
Department 23

CLASS ACTION

**DECLARATION OF NYCOLE TORRES
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 1, 2024
Time: 10:00 a.m.
Department: 23

DECLARATION OF NYCOLE TORRES

I, **Nycole Torres**, hereby declare as follows:

1. I am over 18 years of age and a resident of Arizona. I am one of the named plaintiffs 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 Carl Zeiss Meditec, Inc (“Carl Zeiss Meditec”) as an hourly-paid Senior Sales Representative starting approximately March 1, 2020. I decided to seek legal advice about my work experiences with Carl Zeiss Meditec. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Carl Zeiss Meditec paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **5 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **9 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **14 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included gathering documents concerning my employment with Carl Zeiss Meditec, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other non-exempt hourly-paid employees, and helping develop a strategy as to what documents and information to obtain from Carl Zeiss Meditec. 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 available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as

possible and gave them as much information and identified as many documents as I could. I spent at least **13 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 policies, practices, and procedures of Carl Zeiss Meditec.

5. As far as the settlement is concerned, I spent about **4 hours** reviewing the settlement agreement and about **3 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 result obtained in this case, and as a class representative, I respectfully request that the Court award me an enhancement payment in the amount of \$10,000.00 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.

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

Executed on this day 07/08/2024, at Goodyear, Arizona.

Electronically Signed 2024-07-08 22:20:31 UTC - 72:50:32:109
Nycole Torres
Hintex AssureSign® 6117c124-4b61-4378-a461-b1a7016f5c31

Nycole Torres