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Attorneys for Plaintiffs Randy Meirose and Antonio Arzate

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN MATEO

TRADER JOE'S WAGE AND HOUR CASES

Case No.: JCCP 5196

Coordination Proceeding Special Title
(Cal. R. Ct. 3.550)

Assigned to the Hon. Mark A. McCannon; Dept. 2

**DECLARATION OF ANTONIO ARZATE IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: March 12, 2026
Time: 3:00 p.m.
Place: Courtroom K

FAC Filed: June 25, 2021

DECLARATION OF ANTONIO ARZATE

I, Antonio Arzate, hereby declare as follows:

1. I am over eighteen years old. Unless the context indicates otherwise, I have personal knowledge of the following facts, and if called as a witness, I could and would testify competently to them. I am a named plaintiff in the above-captioned action, and a representative for the Settlement Class. I make this declaration in support of the Motion for Preliminary Approval of Class Action Settlement.

2. I was employed by Defendant Trader Joe's Company ("Defendant") as an hourly-paid Crew Member from approximately November 2019 to October 2020 at the Trader Joe's store location in Walnut Creek, California. My typical shifts were from 5:00 p.m. to 11:00 pm approximately, and I worked five or more days per week.

3. I decided to join this lawsuit because I had a number of grievances against Defendant stemming from its labor policies. These grievances are set forth in detail in the operative Complaint and my letter to California Labor and Workforce Development Agency ("LWDA").

4. Apart from their labor policies and practices, I believe Defendants may have wrongfully terminated me. I spoke with attorneys about those circumstances, the potential for a wrongful termination claim, and my legal rights and options. Rather than pursue a claim asserting only my individual rights and seeking only individual financial benefit, I decided to join this action and pursue rights for my fellow California co-workers. I agreed to serve as a lead plaintiff realizing that my involvement would be a matter of public information available to future employers.

5. Prior to joining the action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendant.¹ During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

6. When I agreed to represent other non-exempt employees performing duties for Defendant in the State of California, I understood it was my duty to be readily available and to participate

¹ Although the preservation of my attorney-client privilege requires that I refrain from revealing the specifics of my communications with my attorneys, I understand that the privilege is not waived by stating generally the matters that I have discussed with my attorneys.

1 actively in this case. I knew that I would be required to review documents, search for documents and
2 produce them to my attorneys, answer written questions, potentially answer oral questions and testify
3 truthfully under oath, and be available to appear in court, if necessary. I understood that I needed to
4 maintain awareness of the status and progress of the lawsuit.

5 7. After retaining my attorneys, I spent considerable time on the phone discussing the facts
6 of my case with my attorneys. I discussed the facts related to my employment with Defendant, including
7 discussing my job duties and responsibilities, my job position, the hours and days I worked, and how I
8 was compensated.

9 8. My attorneys provided me with a draft of the First Amended Complaint for my review
10 and approval. I closely reviewed the First Amended Complaint to ensure accuracy and completeness.
11 Following the filing of the First Amended Complaint, I collaborated with my attorneys on the
12 prosecution of my claims, and I regularly contacted my attorneys to stay current on the status of the
13 litigation, and to discuss my attorneys' progress in prosecuting the claims.

14 9. I have worked to the best of my ability to prosecute this action on behalf of the entire
15 class, always considering the interests of the class members just as I would consider my own interests. I
16 believe class actions are an important tool to assure compliance with the law even where an individual's
17 losses may be relatively small. I have no interests which are inconsistent with the interests of the class.

18 10. Since joining this lawsuit until now, I have kept aware of the status of the lawsuit and
19 provided my attorneys with information used by them in the litigation. I have spent large amounts of
20 time and effort pursuing my claims and the claims of the other employees from the time I retained my
21 attorneys to the present date.

22 11. I worked closely with my attorneys during the discovery phase of the litigation, and in
23 particular, I spent considerable time working with my attorneys to prepare responses to Defendant's
24 discovery requests, including 10 requests for admission, 2 sets of form interrogatories, 35 special
25 interrogatories, and 68 requests for production.

26 12. In addition to written discovery, Defendant's counsel took my deposition on April 29,
27 2024, which required me to take a day off work from my job at Acalanes Union High School. Prior to
28 my deposition, I conferred with my attorneys over two days to prepare, and to learn more about the

1 deposition process. Following my deposition, I carefully reviewed the deposition transcript to ensure that
2 my testimony was properly and accurately recorded.

3 13. Apart from discovery, I assisted my attorneys in preparing the motion for class
4 certification, and I also provided a declaration in support of the motion.

5 14. I answered my attorneys' questions and made myself available by phone for the
6 September 5, 2025 mediation in this matter.

7 15. I have carefully reviewed the terms of the proposed settlement. My attorneys explained
8 the specifics of how the settlement would work and I accepted the settlement only after I had spent time
9 evaluating the proposed outcome to assure that it was fair. Based on my attorneys' evaluation and
10 recommendation, and my own review, I believe the settlement is fair and reasonable and adequately
11 compensates Class Members.

12 16. In summary, over the course of this litigation I have spent a significant amount of time
13 conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement
14 and related documents. I estimate that I have spent between 45 and 55 hours assisting my attorneys in the
15 prosecution of the class claims in this lawsuit, apart from the seating claims that went to trial.

16 17. Throughout this case, I have not sought individual benefits from the lawsuit. Rather, I
17 maintained this lawsuit because I wanted to hold Defendant accountable for their unlawful conduct. I
18 believe that I have fulfilled my responsibilities, and I will continue to fulfill those responsibilities, to the
19 best of my ability, until the conclusion of the case.

20 18. I am committed to this case and will continue to make myself available as needed in the
21 settlement process.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct. Executed on [Date] 2/13/2026, at [City] Antioch, California.

24 DocuSigned by:

25 Antonio Arzate

26 1865349925CA48B...
27 Antonio Arzate
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