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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 RANDY MEIROSE 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 RANDY MEIROSE

I, Randy Meirose, 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 and Store Clerk from approximately November 2009 to December 2018 at the Trader Joe's store location in Palo Alto, California. I usually worked approximately 40 hours per week.

3. I decided to file 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. Prior to filing 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.

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

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

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 was compensated.

2 7. My attorneys provided me with a draft of the Complaint for my review and approval. I
3 closely reviewed the Complaint to ensure accuracy and completeness. Following the filing of the
4 Complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly contacted
5 my attorneys to stay current on the status of the litigation, and to discuss my attorneys' progress in
6 prosecuting the claims.

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

11 9. Since initiating this lawsuit until now, I have kept aware of the status of the lawsuit and
12 provided my attorneys with information used by them in the litigation. I have spent large amounts of
13 time and effort pursuing my claims and the claims of the other employees from the time I retained my
14 attorneys to the present date.

15 10. I worked closely with my attorneys during the discovery phase of the litigation, and in
16 particular, I spent considerable time working with my attorneys to prepare responses to Defendant's
17 discovery requests, including 10 requests for admission, 2 sets of form interrogatories, 35 special
18 interrogatories, and 110 requests for production.

19 11. In addition to written discovery, Defendant's counsel took my deposition on March 15,
20 2021, which required me to take a day off from my work at Whole Foods. Prior to my deposition, I
21 conferred with my attorneys in multiple sessions to prepare, and to learn more about the deposition
22 process. Following my deposition, I carefully reviewed the deposition transcript to ensure that my
23 testimony was properly and accurately recorded.

24 12. Apart from discovery, I assisted my attorneys in preparing the motion for class
25 certification, and I also provided a declaration in support of the motion.

26 13. I answered my attorneys' questions and made myself available by phone for the
27 December 4, 2020 and September 5, 2025 mediation sessions in this matter.

28 14. I have carefully reviewed the terms of the proposed settlement. My attorneys explained

1 the specifics of how the settlement would work and I accepted the settlement only after I had spent time
2 evaluating the proposed outcome to assure that it was fair. Based on my attorneys' evaluation and
3 recommendation, and my own review, I believe the settlement is fair and reasonable and adequately
4 compensates Class Members.

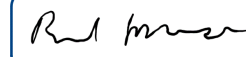
5 15. In summary, over the course of this litigation I have spent a significant amount of time
6 conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement
7 and related documents. I estimate that I have spent between 45 and 55 hours assisting my attorneys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

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

13 17. I am committed to this case and will continue to make myself available as needed in the
14 settlement process.

15 I declare under penalty of perjury under the laws of the State of California that the foregoing is
16 true and correct. Executed on [Date] 2/12/2026, at [City] ^{PO1}, California.

DocuSigned by:



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Randy Meirose