

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

COURTNEY REESE 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;

Plaintiff,

vs.

ASIAN BOX PALO ALTO, LLC, a California
limited liability company; ASIAN BOX, an
unknown business entity; and DOES 1 through
100, inclusive,

Defendants.

Case No. 19CV346589

Honorable Sunil R. Kulkarni
Department 1

CLASS ACTION

**DECLARATION OF COURTNEY
REESE IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Yasmin Hosseini); and [Proposed]
Order filed concurrently herewith]]

Date: August 11, 2022
Time: 1:30 p.m.
Department: 1

Complaint Filed: April 18, 2019
FAC Filed: September 29, 2021
Trial Date: None Set

DECLARATION OF COURTNEY REESE

I, **Courtney Reese**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff 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 Asian Box Palo Alto, LLC (“Asian Box”) in an hourly-paid Cashier, Shift Lead, and Manager from approximately June 2016 to approximately May 2017 and approximately February 2018 to approximately March 2018. I decided to seek legal advice about my work experiences with Asian Box and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Asian Box was held accountable for not paying 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 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 9 hours discussing my situation, wage-and-hour class actions in general and representative actions under the Private Attorneys General Act (“PAGA”), and what it means to be a named plaintiff, a class representative, and, eventually, PAGA representative.

3. I have spent over 16 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Asian Box, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Asian Box. 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

1 possible and gave them as much information and identified as many documents as I could. I
2 spent at least 12 additional hours speaking with my attorneys about the case, identifying potential
3 witnesses, providing my attorneys with documents and information concerning the case, and also
4 describing policies, practices, and procedures of Asian Box.

5 5. As far as the settlement is concerned, I was available to review documents and
6 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
7 agreement and about 5 hours asking questions and discussing the potential settlement with my
8 attorneys before signing the settlement agreement.

9 6. I believe that I have done everything that my attorneys have asked of me and have
10 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
11 and the State of California. I think my efforts helped to get the result obtained in this case, and
12 as a class and PAGA representative, I respectfully request that the Court award me an incentive
13 payment in the amount of \$8,000.00 for my active participation in this case. Taking into
14 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

15 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this case. The only compensation I will receive is whatever amount
18 the Court awards as an incentive payment, as well as my share of the settlement as a class
19 member and an aggrieved employee.

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

22 Executed this ^{05/16/2021} ____ day of May 2022, at Clovis, California.

23 Electronically Signed  2022-05-16 23:55:45 UTC - 96.86.152.193
Hintex AssureSign® 896b329c-17eb-47a1-bd21-ae97018016b

24 Courtney Reese