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10 Attorneys for Plaintiffs and the Class

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF ORANGE**

13 RAEIGN VELASQUEZ, MIKAYLA ASEVO
14 and ERIC RIVAS on behalf of themselves and
on behalf of all persons similarly situated

15 Plaintiffs,

16 v.

17 TEAM BLAZE, a California Corporation;
18 GHOLAMREZA MEDALI, an individual; and
19 DOES 1 to 100, inclusive,

20 Defendants.

Case No. 30-2021-01187932-CU-OE-CXC

[Assigned for all purposes to the Hon. Melissa
R. McCormick, Dept. CX104]

**DECLARATION OF JONATHAN A.
WEINMAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
REPRESENTATIVE SETTLEMENT**

Date: May 8, 2025

Time: 2:00 p.m.

Dept.: CX104

Complaint Filed: March 9, 2021

Trial Date: Not set

1 I, Jonathan A. Weinman, hereby declare and state as follows:

2 1. I am an attorney admitted to practice before the courts of the State of California. I
3 am a principal and founding partner of Broslavsky & Weinman, LLP, one of the attorneys of
4 record for Plaintiffs Raign Velasquez, Mikayla Asevo, and Eric Rivas (collectively,
5 “Plaintiffs”), in the above-entitled action.

6 2. I have personal knowledge of the matters set forth herein, and if called upon as a
7 witness to testify thereto, I could and would competently do so.

8 3. I graduated from Southwestern Law School’s condensed SCALE Program in
9 2008, during which I worked as a pro-bono mediator on the Los Angeles Superior Court
10 Alternative Dispute Resolution Panel. My work was recognized by the State Bar of California
11 with the Wiley W. Manuel Certificate for Pro Bono Legal Services in 2007. Between 2008 and
12 2013, I was an associate and then a senior associate at Krieger & Krieger, A Law Corporation,
13 handling exclusively labor and employment matters. While at Krieger & Krieger, I worked on a
14 variety of FEHA claims as well as a number of employment related class actions.

15 4. My class action experience at Krieger & Krieger includes, but is not limited to,
16 the following cases:

- 17 a. *Aryeh v. Canon Business Solutions, Inc.* (2013) 55 Cal.4th 1185, which was
18 successfully argued before the California Supreme Court and extended the
19 continuing accrual doctrine of Unfair Competition Law (UCL) claims under
20 Business and Professions Code Section 17200;
- 21 b. *Iskanian v. CLS Transportation Los Angeles, LLC* (2014) 59 Cal.4th 348. As a
22 result of my work on the *Aryeh* matter, I was retained as a consultant and
23 provided assistance to Capstone Law in conjunction with their Supreme Court
24 petition in *Iskanian*;
- 25 c. *Washington v. Siemens Medical Solutions Diagnostics, et al.*, Los Angeles
26 Superior Court Case No. BC387302, a wage and hour class in which Class
27 Certification was granted prior to settlement of the case;
- 28 d. *Smith v. CEVA Logistics U.S. Inc., et al.*, United States District Court, Central

District, Western Division, Case No. CV 09-4957 CAS (SSx), a wage and hour class which resulted in a substantial settlement for the class;

e. De La Torre v. Mexi-Grill, LLC, et al., Orange County Superior Court Case No. 30-2009-00314093-CU-OE-CXC, a wage and hour class that resulted in a substantial settlement for the class;

f. Saenz v. Side Bar & Associates, Orange County Superior Court Case No. 07CC01266, a wage and hour class that was certified;

g. Luparello v. VIP Tours of California, Inc., Los Angeles Superior Court Case No. BC538570, a medical benefit and improper wage deduction class that was certified, in which I was retained by Krieger & Krieger after co-founding Broslavsky & Weinman, LLP.

5. I left my employment with Krieger & Krieger in 2013 to co-found Broslavsky & Weinman, LLP, handling plaintiff-side employment and consumer cases. Mr. Broslavsky and I were trial co-counsel in the matter of *Whitfield v. Broadspectrum Downstream Services, Inc., et al.*, Los Angeles Sup. Ct. Case No. BC632479, where plaintiff was awarded a total of \$826,877.83, including punitive damages. We were also trial co-counsel in the matter of *Kukreja v. Dedication and Everlasting Love to Animals*, Los Angeles Sup. Ct. Case No. BC532962, where plaintiff was awarded \$148,832.77. We have also reached equitable resolutions on numerous other employment matters, including a substantial resolution in a six-plaintiff Complex sexual harassment matter, entitled *Swanger v. Stater Bros. Markets, et al*, San Bernardino Sup. Ct. Case No. CIVDS1707999.

6. I was also certified as class counsel in *Smith, et al. v. HR Direct, Services. et al.*, San Bernardino County Superior Court, Case No. CIVDS1901660 and *Salas et. al. v. J&S Restaurants, Inc. et. al.*, Ventura County Superior Court, Case No. 56-2019-00526959-CU-OE-VTA.

7. I have been actively involved in this litigation from the outset, including but not limited to communication with the Plaintiffs and witnesses, helping to prepare documents, and reviewing documents from Defendants and forensic expert.

8. All sides have apprised the other of their respective factual contentions, legal theories and defenses, and engaged in extensive arms' length negotiations. Based on their own independent investigation and evaluation, the Parties and their counsel believe that the Settlement for the consideration and on the terms set forth in the Class and Representative Action Settlement Agreement is fair, reasonable, and adequate and the settlement is in the best interests of the Classes and Defendants in light of all known facts and risks.

9. I have incurred approximately 44.9 hours in connection with the litigation of this lawsuit. A breakdown of these hours is reflected in the spreadsheet attached as Exhibit 1.

10. My current billing rate is seven hundred dollars (\$700.00) per hour. In 2022, in *Salas et. al. v. J&S Restaurants, Inc. et. al.*, the Court approved my then requested rate of six hundred dollars (\$600.00). The rate of \$700.00 per hour is also in the mid-range of the rates for attorneys in the area with similar levels of experience. My attorney's fees thus total \$31,430.

11. After a reasonably inquiry, I am not aware of related pending actions or other cases that may be impacted by this settlement.

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

Executed on April 12, 2025, at Los Angeles, California.

Jonathan A. Weinman

Exhibit 1

VELASQUEZ V. BLAZE - JONATHAN A. WEINMAN HOURS**Description of Task**

Confer with Asevo about potential case	0.8
Review documents sent by Asevo	1.3
Confer with Velasquez about potential case	1.1
Review documents sent by Velasquez	0.6
Confer with other witnesses about potential case	1.7
Review documents sent by witnesses	1.2
Review the pleadings and docket in 2 prior class actions against Defendants	4.3
Prepare special interrogatories to Blaze	5.4
Prepare requests for production to Blaze	5.8
Prepare special interrogatories to Medali	0.5
Prepare requests for production to Medali	3.4
Draft form interrogatories to Blaze and Medali	0.7
Review documents and data produced by defendants	4.8
Edit mediation brief and exhibits	2.5
Prepare notice of PMK deposition	1
Review Matson's Driscoll's updated analysis	1.2
Review and revise settlement agreement	0.7
Prepare declaration in support of preliminary approval motion	1.4
Prepare declarations of Velasquez, Asevo and Rivas in support of preliminary approval motion	3.6
Review and revise class notice per the Court's minute order (April 25, 2024)	0.5
Review and revise addendum per the Court's minute order (April 25, 2024)	0.4
Prepare declaration in support of final approval motion	1.3
Review and revise proposed final approval order	0.7
	44.9