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

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

Plaintiffs,

v.

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

Defendants.

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

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

**DECLARATION OF RAEIGN
VELASQUEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: May 8, 2025
Time: 2:00 p.m.
Dept.: CX104

Complaint Filed: March 9, 2021
Trial Date: Not set

I, Raeign Velasquez, hereby declare and state as follows:

1. I am an individual over the age of 18 years old, and reside in Los Angeles, California. I am the named plaintiff in this matter. I have personal knowledge of the facts set forth below, and if called to testify I could and would do so competently.

2. I was previously employed by Defendant Team Blaze as an associate and shift lead from approximately January 2019 through December of 2020. I am alleging that during my employment with Team Blaze, I was not provided a 30-minute meal period for every 5 hours of work and a second 30-minute meal period when I had to work more than 10 hours per day. I am also alleging that Team Blaze failed to pay me minimum and overtime wages for all hours worked, including sending me text messages and calling outside of working hours about schedule or other work matters and not paying me for that time, and also requiring me to attend meetings and not paying me for the time attended. I believe that the wage statements I received were not accurate because of unpaid overtime and minimum wage, and non-payment of premium wages for breaks.

3. During the pendency of this action, I was required to provide assistance to my attorneys, including providing them with information over the phone and sending supporting documentation by email and/or text. I also sent my attorneys a video which I contend shows alteration of time records. Additionally, I assisted my attorneys with getting further supporting information and documents from other current and former employees.

4. Throughout this case, I have been continuously kept informed of the status of the lawsuit. From the time I first contacted my attorneys in December 2020 through the settlement, I estimate that I spoke to them on the phone, texted and/or emailed them around 50 times. I estimate that I spent about 40 hours assisting my attorneys on the case.

5. I understand that the class claims alleged in this action were brought on behalf of other employees, and thus I am acting as a representative for the Class. As the class representative, I recognize that it is my responsibility to act in the Class's best interest and not my own. I will not put my own interests ahead of that of the Class. I am also not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect

my ability to serve as representative for the Class.

6. I have been and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to represent the interests of the Class. I understand my duties and responsibilities to the proposed class and will carry out those duties as necessary.

7. I have discussed the terms of the settlement with my attorneys, and based on the information provided, I am of the opinion that settlement for the amounts and on the terms set forth in the Settlement Agreement is fair, reasonable, and adequate and is in the best interests of the Class.

8. I made the decision to serve as a Class Representative because I believed it was the right thing to do. I understood that I could become responsible for some or all of Defendants' legal costs if the case did not conclude successfully. I also understood that filing this lawsuit is a public record and may potentially affect my future employment prospects.

9. I believe that because of my and other Class Representatives' actions, many others have benefited by this case. I feel it is a positive result and accomplishment for Defendants' employees.

10. I understand that in addition to the claims that are being released by the proposed settlement, I agreed to provide a general release of claims, which I understand is a more expansive release than provided by the class members.

11. My estimated recovery as a class member is \$314.10, which I understand is based on the workweeks I worked during the Class Period, like all other class members and/or pay periods I worked during the PAGA Period. I am not anticipating or receiving any other compensation except for my \$304.37 in Individual Class Payment and \$9.73 for my Individual PAGA Payment and requested Service Award.

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

4/8/2025

3 Executed on _____, 2025, at Los Angeles, California.

Signed by:


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RAEIGN VELASQUEZ