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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
and ERIC RIVAS on behalf of themselves and
14 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.
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Case No. 30-2021-01187932-CU-OE-CXC

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

**DECLARATION OF ERIC RIVAS 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

1 I, Eric Rivas, declare as follows:

2 1. I am an individual over the age of 18 years old and am a resident of California. I
3 am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and
4 if called to testify I could and would do so competently.

5 2. I was employed by Defendant Team Blaze as an associate and shift lead from
6 approximately November of 2016 through November of 2018, and again from November 2019
7 through December of 2020. I am alleging that like other Class Members, I was not paid all
8 regular, minimum, and overtime wages owed, provided with off-duty meal and rest breaks, paid
9 all wages owed upon separation of employment, and not provided with accurate itemized wage
10 statements.

11 3. Throughout this litigation, I have spent a significant amount of time discussing
12 this matter with my attorneys on many occasions and explaining Team Blaze's practices at my
13 location. As I was the Class Representative who has worked for Team Blaze the longest, the
14 attorneys had many questions for me and I had a lot of information to share. I also conferred
15 with my attorneys regarding documents, which I forwarded them.

16 4. During the course of this litigation, I have made myself available to answer
17 questions, gather documents, and prepare and review any written responses to my lawyers. I
18 estimate that I have spent 35 hours in the prosecution of this action.

19 5. I understand that this action was brought on behalf of all other current and former
20 employees within the State of California, and thus I am acting as a representative for the Class.
21 As class representative, I understand that it is my responsibility to act in the best interest of the
22 Class and not my own. I agree that I will not put my own interests ahead of that of the Class.
23 Moreover, I am not aware of any conflicts that exist between my interest and the interests of the
24 Class that would impair or affect my ability to serve as representative for the Class.

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

1 7. I have discussed the terms of the settlement with my attorneys and based on the
2 information provided, I believe the settlement to be fair, adequate, and reasonable for myself and
3 for the entire Class.

4 8. I understand that I could have been liable for Defendant's legal costs had
5 Defendant prevailed. I also understand that this lawsuit was filed in the public court records,
6 which may affect my ability to obtain future employment.

7 9. I assumed these risks by helping to bring this lawsuit, and I believe that my
8 former coworkers will benefit because of the actions that I have taken. I feel that it is a positive
9 accomplishment and I am glad with the result.

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

13 11. My estimated recovery as a class member is \$138.80, which I understand is based
14 on the workweeks I worked during the Class Period, like all other class members and/or pay
15 periods I worked during the PAGA Period. I am not anticipating or receiving any other
16 compensation except for my \$134.63 Individual Class Payment and \$4.17 for my Individual
17 PAGA Payment and requested Service Award.

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

20 Executed on 4/09, 2025, at Los Angeles, California.

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23 ERIC RIVAS
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