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Attorneys for Plaintiff

Minerva Castaneda

SUPERIOR COURT OF THE STATE OF CALIFORNIA**FOR THE COUNTY OF SAN DIEGO**

Minerva Castaneda, 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.

Casa de las Campanas, Inc., a California
corporation; and DOES 1-50, inclusive,

Defendants.

Case No.: 37-2021-00022395

Honorable Gregory W. Pollack
Department C-71

**DECLARATION OF MINERVA
CASTANEDA IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL**

[Plaintiff's Unopposed Motion for Preliminary
Approval of Class Action Settlement;
Declaration of Proposed Class Counsel
(Danielle L. GruppChang); and [Proposed]
Order filed concurrently herewith]

Date: March 10, 2023

Time: 9:30 am

Department: C-71

Complaint Filed: May 20, 2021

FAC Filed: September 23, 2022

Trial Date: None Set

DECLARATION OF MINERVA CASTANEDA

I, Minerva Castaneda, 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, and 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 Defendant Casa de las Campanas, Inc. ("Casa") from approximately January 1997 to approximately June 2020 in multiple non-exempt, hourly-paid positions. I had concerns regarding Casa's treatment of their employees, including myself, so I spent about 4 hours researching California employment laws and looking for the right employment law firm to schedule a consultation. After speaking to multiple attorneys, I spoke to Danielle GruppChang at Brock & Gonzales, LLP and spoke to her for approximately 5 hours about my experiences at Casa and what to expect during a potential case. Based on our conversation, I decided to retain Brock & Gonzales, LLP to help me file a lawsuit against Casa on behalf of the other employees that I believe were not paid all of their earned wages by Casa.

3. After retaining Brock & Gonzales, LLP, I spent about 6 hours discussing the details of my experiences working at Casa, the other theories involved in a potential lawsuit, class action and representative Private Attorneys General Act action lawsuits, and what my responsibilities would be as a named representative and PAGA representative.

4. After the lawsuit was filed, I estimate I spent at least 15 hours communicating with my attorneys. I regularly called my attorneys to get updates and provide any additional information I had obtained. I also made myself available to answer texts and emails and to have scheduled conferences with my attorneys. I answered all of my attorneys' questions about Casa to the best of my ability and did my best to seek out the information if I did not know the answer. I provided information about other non-exempt, hourly-paid employees, including but not limited to their job titles and job duties and what I had witnessed other employees experience at work. I

1 about Casa.

2 5. I made myself available all day on the day of the mediation and spent about 3
3 hours beforehand discussing what a potential settlement of the action would entail with my
4 attorneys. I spent about 6 hours reviewing the settlement agreement and about 8 hours asking
5 questions and discussing the potential settlement with my attorneys before signing the settlement
6 agreement.

7 6. I answered all of my attorneys' questions as well as I could, provided them with
8 all of the relevant information I had as well as all of the documentation I could gather, researched
9 each aspect of the lawsuit to the best of my ability, and did everything else my attorneys asked of
10 me. I believe I did everything I could to get a fair result for the other employees and the state of
11 California. I think everything I did helped to get the result obtained in this case.

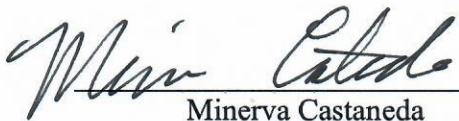
12 7. I respectfully request that the Court approve and award me a Class Representative
13 Payment in the amount of \$7,500.00 for my efforts and active participation in the case. Taking
14 into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

15 8. I am not related to anyone associated with Brock & Gonzales, LLP.

16 9. I have not entered into any undisclosed agreements or received any undisclosed
17 compensation in this case.

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 February 14, 2023, at San Diego, California.

21 
22 Minerva Castaneda

PROOF OF SERVICE

1013a (3) CCP Revised 5/1/88

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 6701 Center Drive West, Ste. 610, Los Angeles, CA 90045.

On February 17, 2023, I served the foregoing documents described as: **DECLARATION OF MINERVA CASTANEDA IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL** on the interested parties in this action, addressed as follows:

Thomas S. Ingrassia, Esq.

Christine Y. Dixon, Esq.

PETTIT KOHN INGRASSIA LUTZ & DOLIN PC

11622 El Camino Real, Suite 300

San Diego, CA 92130

Emails: tigrassia@pettitkohn.com; cdixon@pettitkohn.com

Attorneys for Defendant, CASA DE LAS CAMPANAS, INC.

☒ **ONLY BY ELECTRONIC TRANSMISSION.** Only by e-mailing the document(s) to the persons at the e-mail address(es) listed based on notice provided on **March 17, 2020** that, during the Coronavirus (Covid-19) pandemic, this office will be working remotely, not able to send physical mail as usual, and is therefore using only electronic mail. No electronic message or other indication that the transmission was unsuccessful was received within a reasonable time after the transmission.

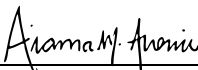
☐ **By U.S. Mail,** I deposited such envelope(s) in the mail at Los Angeles, California, with postage thereon fully prepaid.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

☐ **By Personal Service,** I caused such envelope(s) to be delivered by hand to the office(s) of the addressee(s).

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

Executed on February 17, 2023, at Los Angeles, California.



Arianna Aveni