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Attorneys for Plaintiff
REYNA SANCHEZ NAVA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

REYNA SANCHEZ NAVA, individually and
on behalf of others similarly situated, and as an
aggrieved employee and Private Attorney
General,

Plaintiff,

vs.

S & S COASTAL FOODS, LLC, a Delaware
Limited Liability Company; SAMIR
ABRAHAM aka SAM ABRAHAM, an
individual; SUHAD ABRAHAM aka SUE
PRESTON, an individual; and DOES 1
through 50, inclusive,

Defendants.

Case No. 21STCV34779

*Assigned for All Purposes to: Hon. Lia
Martin, Dept. 3*

**DECLARATION OF MATTHEW
RICHARDSON, ESQ. IN SUPPORT OF
MOTION FOR APPROVAL OF CLASS,
COLLECTIVE, AND REPRESENTATIVE
SETTLEMENT AGREEMENT AND
CLASS NOTICE**

Hearing Date: September 25, 2024
Hearing Time: 9:00 A.M.
Department: 3

Complaint Filed: September 21, 2021
Trial Date: None Set

1 **DECLARATION OF MATTHEW RICHARDSON, ESQ.**

2 I, Matthew Richardson, Esq., declare as follows:

3 1. I am a associate with the law firm of MUSICK, PEELER & GARRETT LLP
4 ("MPG"), which represents Defendants S & S COASTAL FOODS, LLC, SAMIR ABRAHAM
5 aka SAM ABRAHAM, and SUHAD ABRAHAM aka SUE PRESTON ("Defendants") in the
6 action entitled *Nava v. S & S Coastal Foods, LLC, et al.*, Los Angeles County Superior Court,
7 Case No. 21STCV34779 (the "Action"). I am over the age of 18, have personal knowledge of the
8 facts stated herein and if called as a witness I could and would competently testify thereto.

9 2. I make this declaration in support of Plaintiff REYNA SANCHEZ NAVA's
10 ("Plaintiff") Motion for Preliminary Approval of Class, Collective, and Representative Settlement
11 Agreement and Class Notice.

12 3. I am not aware of any other pending matters or actions asserting claims that will
13 be extinguished or adversely affected by the Settlement, except *Nava v. S & S Coastal Foods,*
14 *LLC, et al.*, Orange County Superior Court Case No. 30-2021-01216425-CU-OE-CXC.

15 4. Defense Counsel has no actual or potential conflicts of interest with the Claims
16 Administrator Phoenix Class Action Administration Solutions ("Claims Administrator"), as
17 Defense Counsel has no interest or relationship, financial or otherwise, other than a professional
18 relationship arising out of prior experiences administering settlements.

19 5. Similarly, to my knowledge, Defendants also have no interest or relationship,
20 financial or otherwise, with the Claims Administrator.

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

23 Executed on July 9, 2024

24 

25 _____
26 Matthew Richardson, Esq.