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Attorneys for Plaintiffs Liliam Urrutia and Vanessa Dorantez Galicia

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF CONTRA COSTA

LILIAM URRUTIA and VANESSA  
DORANTEZ GALICIA, as aggrieved employees  
pursuant to the Private Attorneys General Act  
("PAGA"), on behalf of the State of California  
and other aggrieved employees,

Plaintiffs,

vs.

SHAHS OF SHIRAZ, INC., a California  
corporation; BUNCH OF BULL, INC., a  
California corporation; CENTRAL VALLEY  
FAST FOODS, INC., a California corporation;  
EUREKA FAST FOODS CORP., a California  
corporation; EUREKA FORTUNE, INC., a  
California corporation; QSR WEST, INC., a  
California corporation; QSR WEST BUILDING,  
INC., a California corporation; QSR WEST  
BUILDING, LLC, a California limited liability  
company; QSR WEST DEVELOPMENT ONE,  
INC., a California corporation; QSR WEST  
DEVELOPMENT, LLC, a California limited  
liability company; and DOES 1 through 10,  
inclusive,

Defendants.

Case No. MSC21-01804

Assigned to the Hon. Charles S. Treat

**DECLARATION OF VANESSA DORANTEZ  
GALICIA IN SUPPORT OF MOTION FOR  
COURT APPROVAL OF THE PAGA  
SETTLEMENT**

Date: TBD  
Time: TBD  
Place: Department 12

Complaint Filed: August 30, 2021

**DECLARATION OF VANESSA DORANTEZ GALICIA**

I, Vanessa Dorantez Galicia, hereby declare as follows:

1. I am over eighteen years old and unless the context indicates otherwise, I have personal knowledge of the following facts and if called as a witness, I could and would testify competently to them.

I am a named plaintiff in the above-captioned action. I make this declaration in support of the Motion for Court Approval of the Parties' PAGA Settlement.

2. I was employed by Defendants at their Burger King restaurant in Livermore, California as a Cook (a non-exempt position) from approximately October 2020 to June 2021.

3. I decided to join this lawsuit because I had a number of grievances against Defendants stemming from their labor policies. These grievances are set forth in detail in the operative Complaint and my letter to California Labor and Workforce Development Agency ("LWDA").

4. Prior to joining the action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendants.<sup>1</sup>

5. During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

6. After retaining my attorneys, I spent considerable time on the phone discussing the facts of my case with my attorneys.

7. I discussed the facts related to my employment with Defendants, including discussing my job duties and responsibilities, my job position, the hours and days I worked, and how I was compensated.

8. I have worked to the best of my ability to prosecute this action on behalf of the LWDA, always considering the interests of the LWDA just as I would consider my own interests.

9. I believe PAGA actions are an important tool to assure compliance with the Labor Code.

10. When I agreed to represent the LWDA as a deputized private attorney general, I understood it was my duty to be readily available and to participate actively in this case.

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<sup>1</sup> Although the preservation of my attorney-client privilege requires that I refrain from revealing the specifics of my communications with my attorneys, I understand that the privilege is not waived by stating generally the matters that I have discussed with my attorneys.

11. I knew that I would be required to review documents, search for documents and produce them to my attorneys, answer written questions, potentially answer oral questions and testify truthfully under oath, and be available to appear in court, if necessary.

12. I understood that I needed to maintain awareness of the status and progress of the lawsuit.

13. Since initiating this lawsuit until now, I have kept aware of the status of the lawsuit and provided my attorneys with information used by them in the litigation.

14. I have carefully reviewed the terms of the proposed settlement. My attorneys explained the specifics of how the settlement would work.

15. I accepted the settlement only after I had spent time evaluating the proposed outcome to assure that it was fair.

16. Based on my attorneys' evaluation and recommendation, and my own review, I believe the settlement is fair and reasonable in light of PAGA's policies and purposes.

17. In summary, over the course of this litigation I have spent a significant amount of time conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement and related documents. I estimate that I have spent between 25 and 35 hours assisting my attorneys in the prosecution of this lawsuit.

18. Throughout this case, I have not sought individual benefits from the lawsuit. Rather, I maintained this lawsuit because I wanted to hold Defendants accountable for their unlawful conduct.

19. I believe that I have fulfilled my responsibilities, and I will continue to fulfill those responsibilities, to the best of my ability, until the conclusion of the case.

20. I am committed to this case and will continue to make myself available as needed in the settlement process.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on [Date] 3/9/2023, at [City] 224 Burgess St Livermore, California.

DocuSigned by:



Vanessa Dorantez Galicia