

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Amalia Reyes

**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, 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

Honorable Charles S. Treat
Department 12

**DECLARATION OF AMALIA REYES
IN SUPPORT OF PLAINTIFFS’
MOTION FOR COURT APPROVAL OF
THE PARTIES’
PAGA SETTLEMENT**

Date: TBD
Time: TBD
Department: 12

DECLARATION OF AMALIA REYES

I, **Amalia Reyes**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the action entitled *Amalia Reyes v. Bunch of Bull, Inc., et al.*, Alameda County Case No. 21CV002239. 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 Bunch of Bull, Inc. ("Bunch of Bull") as an hourly-paid, non-exempt employee from approximately August 2020 to approximately March 2021. I decided to seek legal advice about my work experiences at Bunch of Bull and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Bunch of Bull was held accountable for and stopped its practice of not compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **11 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **9 hours** discussing my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA") in general, and what it meant to bring a PAGA action.

3. I have spent over **22 hours** communicating with my attorneys regarding the matter and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Bunch of Bull, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Bunch of Bull. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and to provide them with any additional information that I had obtained.

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4. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could. I spent at least **16 additional hours** speaking with my attorneys about the matter, identifying potential witnesses, providing my attorneys with documents and information concerning the matter, and also describing policies, practices, and procedures of Bunch of Bull.

5. I spent about **3 hours** reviewing the settlement agreement and about **1 hour** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this matter.

7. I respectfully request that the Court approve and award me a service award in the amount of \$10,000.00 for my efforts and active participation in this matter and broader release of claims. Taking into consideration the time that I have dedicated to this matter to seek relief for the aggrieved employees and the State of California, I believe that this amount is reasonable.

8. I am not related to anyone associated with Lawyers *for* Justice, PC or Capstone Law APC.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is a service award, if approved by the Court, as well as my share of the settlement fund as an aggrieved employee.

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

Executed this 2/14 day of February 2023, at Richmond, California.

Electronically Signed 2023-02-15 01:57:52 UTC - 174.251.160.20

Amalia Reyes

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Amalia Reyes