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Attorneys for Plaintiff and the proposed class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SISKIYOU

MARIA GLORIA GUINTO, an individual, on
behalf of herself and others similarly situated,

PLAINTIFF,

v.

C & K MARKET, INC; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

CASE NO. SCCV-CVCV-2021-0964

[Case Assigned for All Purposes to Courtroom
2]

**DECLARATION OF PLAINTIFF MARIA
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL**

Complaint Filed: September 1, 2021
Trial Date: None Set

DECLARATION OF MARIA GLORIA F. GUINTO

I, MARIA GLORIA F. GUINTO, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff and class representative in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant C & K MARKET, INC (“C & K” or “Defendant”) as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that C & K Market failed to pay wages and/or overtime, failed to reimburse expenses, failed to provide accurate wage statements, and failed to pay all wages due at the time of termination or resignation.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched experienced attorneys who are very experienced with these types of lawsuits. It was important to me to find attorneys with a lot of experience in this area of the law. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed on September 1, 2021.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. My work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys’ various communications regarding this matter, attending a full-day mediation on September 19, 2022 by video conference, and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

7. In the initial settlement agreement before the court, I was entitled to receive a

1 \$10,000 enhancement for being the class representative in this case.

2 8. Based on the unfairness of such a small amount, I insisted that the attorneys for both
3 sides raise that amount to \$80,000. Based on the Court's support of my claim at the last hearing,
4 C&K Market agreed to my demands, subject to the Court discretion to award up to an \$80,000
5 enhancement based on the difficulty I suffered at C&K Market and my work in making this
6 settlement happen. I will also receive \$20,000 for my wrongful termination allegations separate
7 and apart from the class suit.

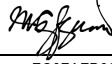
8 9. I believe that said compensation is fair and reasonable, and in the best interests of
9 the class based on the efforts and pain I experienced in this case.

10 10. This declaration is being submitted by me to inform the court of the current
11 circumstances.

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

14 Executed this 4 day of April, 2023 at April, 2023, California.

15 DocuSigned by:

16 

17 MARIA GLORIA F. GUINTO

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 6, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF PLAINTIFF MARIA IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Grace Y. Horoupian
ghoroupian@fisherphillips.com
FISHER & PHILLIPS LLP
2050 Main Street, Suite 1000
Irvine, California 92614

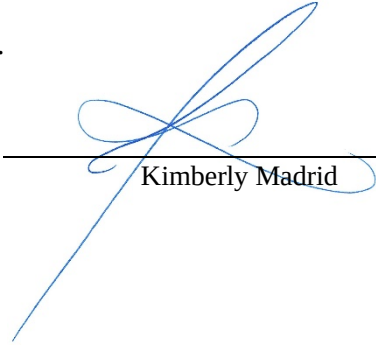
Gregory L. Blueford
gblueford@fisherphillips.com
FISHER & PHILLIPS LLP
621 Capitol Mall, Suite 1400
Sacramento, California 95814

[XX] **BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] **BY ELECTRONIC MAIL TRANSMISSION:** I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 6, 2023, at Encino, California.



Kimberly Madrid