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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE**

EULALIA TRINIDAD, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

GROUNDWORK COFFEE LLC, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 19STCV09758

Honorable Stuart M. Rice
Department SSC1

CLASS ACTION

**DECLARATION OF EULALIA
TRINIDAD IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Yasmin Hosseini); and [Proposed]
Order filed concurrently herewith]

Date: October 30, 2023
Time: 10:30 a.m.
Department: SSC1

Complaint Filed: March 22, 2019
Trial Date: None Set

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I, **Eulalia Trinidad**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. 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 Groundwork Coffee LLC, Groundwork Coffee Holdings, LLC, Groundwork Coffee Roasters, LLC, Edward Cola, and Steven Levan LLC (together, “Defendants”) as an hourly-paid, non-exempt employee from approximately September 2014 to approximately September 2015. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not paying their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 8 hours discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over 9 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff and class representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me throughout the litigation. I responded to

1 them as quickly as possible and gave them as much information and identified as many
2 documents as I could. I spent at least 8 additional hours speaking with my attorneys about the
3 case, identifying potential witnesses, providing my attorneys with documents and information
4 concerning the case, and also describing policies, practices, and procedures of Defendants.
5 During the discovery phase of the litigation, I spent approximately 10 additional hours reviewing
6 Defendants' discovery requests, locating documents, and providing documents, and responses to
7 my attorneys.

8 5. On February 5, 2020, I attended a full day of deposition that lasted approximately
9 5 hours. I spent at least 3 hours preparing for the deposition and approximately 1 additional hour
10 traveling to and from the deposition. After the deposition, I spent at least 3 hours reviewing my
11 testimony and discussing the contents of the deposition transcript with my attorneys.

12 6. As far as the settlement is concerned, I was available to review documents and
13 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
14 agreement and about 2 hours asking questions and discussing the potential settlement with my
15 attorneys before signing the settlement agreement.

16 7. I believe that I have done everything that my attorneys have asked of me and have
17 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
18 obtained in this case, and as a class representative, I respectfully request that the Court award me
19 a service payment in the amount of \$7,500.00 for my active participation in this case. Taking
20 into consideration the time that I have dedicated to this case, I believe that this amount is
21 reasonable.

22 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

23 9. I have not entered into any undisclosed agreements, nor have I received any
24 undisclosed compensation in this case. The only compensation I will receive is whatever amount
25 the Court awards as a service payment as well as my share of the settlement as a class member.

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

3 Executed this ^{10/16/2023} ____ day of October 2023, at Los Angeles, California

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