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Attorneys for Plaintiffs and the Class

**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; and MARKO ASAULYUK, individually, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiffs,

vs.

GROUNDWORK COFFEE LLC, an unknown business entity; GROUNDWORK COFFEE, LLC, a Delaware limited liability company; GROUNDWORK COFFEE HOLDINGS, LLC, a Delaware limited liability company; GROUNDWORK COFFEE ROASTERS, LLC, a Delaware limited liability company; EDWARD COLA, individually; STEVEN LEVAN, individually; and DOES 1 through 100, inclusive,

Defendants.

Case No. 19STCV09758

Honorable Stuart M. Rice
Department SSC-1

CLASS ACTION

DECLARATION OF EULALIA TRINIDAD IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, CLASS COUNSEL FEES PAYMENT, CLASS COUNSEL LITIGATION EXPENSES PAYMENT, AND CLASS REPRESENTATIVES SERVICE PAYMENTS

[Notice of Motion and Motion for Final Approval of Class Action Settlement, Class Counsel Fees and Litigation Expenses Payments, and Class Representatives Service Payments; Declaration of Class Counsel (Joanna Ghosh); Declaration of Class Representative (Marko Asauluk); Declaration of Settlement Administrator (Nick Castro); and [Proposed] Order filed concurrently herewith]

Date: May 24, 2024
Time: 10:30 a.m.
Department: SSC-1

Complaint Filed: March 22, 2019
FAC Filed: November 13, 2023
Trial Date: None Set

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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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