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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 MARKO
ASAULYUK 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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1 I had obtained.

2 4. Throughout my involvement in this matter, I was available to answer any
3 questions my attorneys had, and available to speak and meet with my attorneys whenever they
4 needed me. I responded to them as quickly as possible and gave them as much information and
5 identified as many documents as I could. I spent at least 10 additional hours speaking with my
6 attorneys about the case, identifying potential witnesses, providing my attorneys with documents
7 and information concerning the case, and also describing policies, practices, and procedures of
8 Defendants.

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

13 6. I believe that I have done everything that my attorneys have asked of me and have
14 tried, to the best of my ability, to seek relief as a PAGA representative and for the State of
15 California. I think my efforts helped to get the result obtained in this case, and as a PAGA
16 representative, I respectfully request that the Court award me a service payment in the amount of
17 \$7,500.00 for my active participation in this matter. Taking into consideration the time that I
18 have dedicated to this matter, I believe that this amount is reasonable.

19 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

20 8. I have not entered into any undisclosed agreements, nor have I received any
21 undisclosed compensation in this case. The only compensation I will receive is whatever amount
22 the Court awards as a service payment as well as my share of the settlement as an aggrieved
23 employee.

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

26 Executed this ^{10/17/2023} ____ day of October 2023, at Marina Del Rey, California

27 Electronically Signed  2023-10-17 08:40:28 UTC - 50.196.189.177
Hintex AssureSign® 0e145d9e-0e79-4a5a-8efc-b09d013e76a8

28 Marko Asauluk