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Attorneys for Plaintiff
MICHAEL CORBIN

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

MICHAEL CORBIN, individually, and on
behalf of others aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,
vs.

PARIS BAGUETTE AMERICA, INC., a
Delaware corporation; PARIS BAGUETTE -
BON DOUX, INC., a Delaware corporation;
PARIS BAGUETTE U.S.A., INC., a Delaware
corporation; PARIS BAGUETTE FAMILY,
INC., a Delaware corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 22CV014555

*Assigned for All Purposes to: Hon. Frank
Roesch, Dept. 17*

**DECLARATION OF MICHAEL CORBIN
IN SUPPORT OF MOTION FOR ORDER
APPROVING SETTLEMENT PURSUANT
TO CALIFORNIA LABOR CODE
PRIVATE ATTORNEYS GENERAL ACT
AND ENTERING JUDGMENT**

Reservation ID: 150446525804

Hearing Date: March 12, 2025
Hearing Time: 3:00 p.m.
Department: 17

Complaint Filed: July 18, 2022
Trial Date: Not Set

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1 a PAGA representative. As the case moved forward, I have had several extensive conversations with
2 my attorneys, during which I provided substantial information regarding Defendants' policies,
3 practices, and procedures, as well as my own experiences working for Defendants. At my attorneys'
4 request, I searched for any documents I'd been provided by Defendants, including old wage
5 statements, notes I'd taken regarding my employment, and any type of policy documents I had
6 signed or been given and provided these to my attorneys. I also prepared for my deposition for one
7 week, and spent one full-day having my deposition taken.

8 7. Throughout my involvement in this case, I have routinely checked in with my
9 attorneys and their staff to monitor the status of the case. I had several additional phone calls with
10 my attorneys throughout the case and attempted to respond promptly whenever my attorneys
11 contacted me or needed additional information. In addition, I assisted my attorneys in preparing for
12 the settlement conference in this action, made myself available during the settlement
13 conference, and discussed issues related to the settlement of this action.

14 8. When the case settled, I reviewed the Settlement Agreement and discussed its
15 terms with my attorneys. I kept in contact with my attorneys throughout the settlement process
16 and provided additional information when my attorneys reached out to me. I will continue to
17 actively participate in this lawsuit and monitor the case until it is finalized.

18 9. I believe I took on a substantial risk in agreeing to serve as the PAGA
19 representative, despite being made aware that there was no certainty regarding the outcome of the
20 case or how long it would take to recover the wages owed to myself and the other Aggrieved
21 Employees.

22 10. Although I was concerned about being the PAGA representative in a public
23 lawsuit, I decided to put my own interests aside and bring forth a lawsuit that would be beneficial to
24 the State of California and all Aggrieved Employees. I have not yet suffered any adverse
25 consequences as a result of this lawsuit, but neither have I yet received any benefit for representing the
26 State of California or the Aggrieved Employees, or for the help I provided my attorneys.

27 11. In addition to the substantial time that was spent on this matter, I have also agreed to
28 a much broader general release of all claims I may have against Defendants, rather than the more

1 limited release agreed to by the State of California and the Aggrieved Employees.

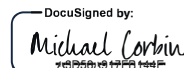
2 12. I believe that I have done everything that my attorneys have asked of me and have
3 tried, to the best of my ability, to represent the State of California and the Aggrieved Employees. I
4 think that my efforts helped get the result obtained in this case.

5 13. Accordingly, I respectfully request that the Court award me an Representative
6 Payment in the amount of \$7,500.00 in recognition of this general release, the benefit I helped obtain
7 for State of California and the Aggrieved Employees, and my active participation in this case. I
8 believe that this amount is fair and reasonable in light of the time I have spent on this case, the risks
9 I assumed bringing the lawsuit and the broader release I have agreed to as part of the Settlement.

10 14. I have not entered into any undisclosed settlement agreements, nor have I received
11 any undisclosed compensation in this case. The only compensation I will receive is whatever amount
12 the Court awards as a representative payment and my share of the PAGA Fund.

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

16 Executed on February 13, 2025, at Oakland, California.

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18 The image shows a DocuSign signature block. It includes the text "DocuSigned by:" followed by a stylized signature of "Michael Corbin". Below the signature, there is a small, partially legible string of characters that appears to be a document ID or hash.

19 Michael Corbin