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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF PLACER**

STEPHANIE KARABINUS, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

CIRCLE PIZZA, LLC, a Delaware
Limited Liability Company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: S-CV-0048669

**DECLARATION OF PLAINTIFF STEPHANIE
KARABINUS IN SUPPORT OF PLAINTIFF'S
MOTION TO APPROVE SETTLEMENT
AGREEMENT PURSUANT TO THE
PRIVATE ATTORNEYS GENERAL ACT**

Date: December 5, 2023
Time: 8:25 a.m.
Dept: 42

Complaint Filed: June 27, 2022
Trial Date: None

1 I, Stephanie Karabinus, declare as follows:

2 1. I am an individual over the age of 18 years old and am a resident of California. I
3 am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and
4 if called to testify I could and would do so competently.

5 2. I am the named plaintiff in the above-referenced representative PAGA action. I
6 was employed by Defendant Circle Pizza, LLC (“Defendant” or “Circle Pizza”) from in or
7 around August 2019 to May 2022. Throughout my employment with Circle Pizza, I was a non-
8 exempt, hourly employee.

9 3. I understand that this PAGA action was brought on behalf of the State of
10 California and other employees of Circle Pizza. I have invested a lot of personal time and energy
11 into representing the interests of my co-workers and the State.

12 4. Throughout the case, I spent time looking for documents relevant to the case,
13 including wage statements, time records and employee handbooks. Additionally, I met with my
14 attorneys on multiple occasions to provide documents and information regarding Circle Pizza’s
15 bonus system, opening and closing procedures, meal and rest period practices and sick pay
16 policy. I also met with my attorneys to discuss the status of the lawsuit and provide input on case
17 documents, such as the PAGA Notice and Complaint.

18 5. Before signing the Joint Stipulation of Settlement and Release under the Private
19 Attorneys General Act (the “Settlement Agreement” or “Agreement”), I discussed in detail the
20 terms of the Agreement with my attorneys. I believe that the terms of the Agreement are fair,
21 adequate and reasonable.

22 6. I did not make the decision to join this representative action lightly. I was
23 concerned by the attention a publicly filed lawsuit would attract. My name would be associated
24 with a lawsuit that I filed against my employer. Additionally, because the claims alleged by me
25 involved the payment of costs to the prevailing party, I could have possibly faced paying the fees
26 and costs of Circle Pizza, had I not prevailed in this action. I also understood that an individual
27 case would have resolved much faster than a representative action and involved much less
28 financial risk than a class action.

7. I respectfully request that the Court award a \$10,000 Enhancement Payment to me. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my current and future employment. In addition, the Settlement requires that I enter into a general release, which I understand is broader than the release that will bind other employees.

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

Executed on September 8, 2023, at Sacramento, California.


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Stephanie Karabinus

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