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Attorneys for Plaintiff Olga Lydia L. Rodriguez,
on behalf of herself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

OLGA LYDIA L. RODRIGUEZ,
individually and on behalf of herself and
all others similarly situated,

Plaintiff,

v.

C FOOD CONCEPTS, INC., a California
Corporation, doing business as SIZZLER,
and DOES 1-50, inclusive,

Defendants.

Case No. 23STCV01589

Assigned for All Purposes to:
Hon. Elihu M. Berle
Dept. 6

**DECLARATION OF PLAINTIFF OLGA
LYDIA L. RODRIGUEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT**

Date: May 8, 2025
Time: 9:00 a.m.
Dept.: 6

Complaint Filed: January 25, 2023
FAC Filed: March 31, 2023
Trial Date: None Set

1 I, Olga Lydia L. Rodriguez, declare as follows:

2 1. I am an individual over the age of 18 years old. I am the named Plaintiff and
3 proposed Class Representative in this action. I have personal knowledge of all the facts in this
4 declaration and, if asked, I would testify to these facts under oath in court.

5 2. From approximately 2001, to January 24, 2022, I worked for Defendant C Food
6 Concepts, doing business as Sizzler (“Defendant” or “Sizzler”) as a non-exempt employee in
7 Pinole, California.

8 3. Because I thought that some of the practices of Defendant were unlawful, I decided
9 to seek legal advice about my work experiences and about filing a lawsuit to obtain relief for my
10 grievances. After speaking with my attorneys about my experiences working for Defendant, class
11 actions, and what it meant to bring a class action and be a class representative, I decided to proceed
12 with a lawsuit against my former employer. I also agreed to represent all persons employed by
13 Defendant in California and classified as non-exempt employees who worked for Defendant during
14 the Class Period, and to obtain relief for the entire class. With my attorneys' assistance, I filed a
15 class action against the Defendant.

16 4. I retained my attorneys who are experienced in both class action and representative
17 action litigation and claims against employers for violations of the California Labor Code. I have
18 no personal relationship or family ties to my attorneys or any officer of the Court. I am not aware
19 of having any actual or potential conflicts of interest with another class member in this case nor am
20 I aware of having any actual or potential conflicts of interest with CPT Group, Inc., the settlement
21 administrator.

22 5. When I agreed to represent other similarly situated prospective, current, and former
23 employees, I understood it was my duty to be readily available and to actively participate in the
24 case. I knew that I needed to keep aware of the status and progress of the lawsuit. At all times, I
25 worked to fulfill these duties on behalf of other employees similarly situated, and I continue to do
26 so through the settlement process.

27 6. I also understood the risks I could face due to my involvement as a named plaintiff.
28 I understood that if I did not prevail in the litigation, I could be held responsible for the payment of

1 Defendant's court awarded litigation costs and potentially attorneys' fees. Therefore, I realized
2 that I was taking a significant amount of risk in filing the lawsuit. I also knew that my name could
3 easily be located on a search of court records and that any prospective employer or member of the
4 public may find out that I had sued my former employer.

5 7. Even though I knew I was taking risks, I knew I had to do what I believed was right
6 and pursue claims on behalf of other employees to vindicate our rights and attempt to recover the
7 wages owed to us. I am proud to know that I played a role in the Class Members being entitled to
8 monetary payments as a result of the filing of this lawsuit.

9 8. In preparing for, and during, this litigation, I spent numerous hours devoted to
10 assisting with this case. I have been on numerous telephone calls discussing the facts of my case
11 with the attorneys and staff of James Hawkins APLC, and spent significant time discussing the
12 facts related to my employment with Defendant with my attorneys, including discussing my job
13 duties and responsibilities, and the hours and days that I worked. I also spent time looking through
14 files for all documents related to my employment which included wage statement, policy
15 documents, and time records. I further spent time on telephone calls discussing these documents. I
16 made myself available during the mediation, and have also spent additional time assisting with the
17 settlement, negotiations, and the reviewing of settlement documents. I have also prepared and
18 reviewed various declarations in support of the proceedings. I estimate that since I filed this lawsuit
19 in January 2023 I have spent approximately 60 hours involved in the litigation and resolution of
20 this matter.

21 9. My attorneys forwarded me copies of the PAGA letter, class complaint, and
22 amended complaint for review in this case. I thoroughly reviewed these documents and discussed
23 the contents with my attorneys. My attorneys also provided me with a copy of the proposed
24 Settlement which I reviewed carefully before signing it.

25 10. It is my opinion that the proposed settlement achieved is fair, adequate and
26 reasonable.

27 11. I understand that approximately 551 current and former employees of Defendant
28 will now receive cash payments they may not otherwise have recovered but for the initiation of this

1 case. I understand that no objections have been received and no class members have requested
2 exclusion from the Settlement. I believe that this excellent result confirms that the settlement fair
3 and reasonable.

4 12. To date, I have not received any benefits as a result of prosecution of the action.

5 13. I am requesting the Court approve the requested \$10,000 Service Payment, which
6 was preliminarily approved by the Court. I believe this amount is reasonable considering the
7 amount of work and time I spent with my attorneys to achieve this excellent settlement over the
8 more than two years since I brought this lawsuit. The time and service I provided to the Class
9 resulted in the parties ultimately agreeing to settle the case and in a positive outcome for the entire
10 Class, who will receive a share of the settlement funds in this case.

11 14. As part of the Settlement I agreed to a general release of any claims I might have
12 against Defendant. I understand that no other Class Members had to enter into a general release. I
13 believe that this general release provides additional consideration for the Service Payment.

14 15. I further believe the amount of the Class Representative Service Payment is very
15 reasonable considering the financial and professional risks I took by bringing a class action lawsuit
16 against my former employer, including the potential of paying court-awarded litigation costs to
17 Defendant, the negative exposure to future employers, and the potential loss of privacy that comes
18 with having my name associated with this lawsuit and being part of the public record.

19 16. I believe the Class Members, who might not have been aware of their rights if not
20 for this class action, will substantially benefit by resolution of their claims against Defendant for
21 the Gross Settlement Amount of \$600,000.

22 17. As the appointed Class Representative, I remain committed to this case and will
23 continue to participate as needed in the final approval and the settlement administration process.

24
25 I declare under penalty of perjury under the laws of the State of California that the foregoing
26 is true and correct. Executed on Feb 28, 2025 in Richmond, California.

27
28 
Olga Lydia Rodriguez (Feb 28, 2025 09:57 PST)

Olga Lydia L. Rodriguez