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*Attorneys for Plaintiff*  
YOLANDA PONCE

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA**

YOLANDA PONCE, individually and on  
behalf of others similarly situated, and as an  
aggrieved employee and Private Attorney  
General,  
Plaintiff,

vs.

LUCKY 7 KING, INC. DBA LUCKY 7  
SUPERMARKET, a California corporation;  
and DOES 1 through 50, inclusive,  
Defendants.

Case No. 23CV411258

*Assigned for All Purposes to: Judge Theodore  
C. Zayner, Department 19*

**DECLARATION OF YOLANDA PONCE  
IN SUPPORT OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION AND  
PAGA SETTLEMENT**

Hearing Date: February 11, 2026  
Hearing Time: 1:30 p.m.  
Department: 19

Complaint Filed: February 17, 2023  
Trial Date: None Set

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I, Yolanda Ponce, declare as follows:

1. I am over 18 years of age and a resident of California. I am the Class and PAGA representative in the Action entitled *Yolanda Ponce v. Lucky 7 King, Inc. dba Lucky 7 Supermarket*, Santa Clara County Superior Court, Case No. 23CV411258. I have personal knowledge of the facts stated herein and if called as a witness I could and would competently testify thereto.

2. I have been employed by Defendant LUCKY 7 KING, INC. dba LUCKY 7 SUPERMARKET (“Defendant”) as a Cashier from approximately August 2018. I was classified as a non-exempt employee and was paid an hourly rate for the work I performed.

3. In or about January 2023, I decided to seek legal advice about my experiences working for Defendant and about pursuing my grievances against Defendant. I contacted Protection Law Group, LLP, and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California. Thereafter, I consulted with the attorneys at Protection Law Group, LLP and discussed my situation, complex wage-and-hour class actions in general, and what it meant to be a named Plaintiff, Class and PAGA Representative.

4. After speaking with my attorneys, I agreed to serve as the Class and PAGA Representative. I was aware that serving as a Class and PAGA Representative could involve additional work including my deposition being taken and that I might have to miss time from work. I still agreed to serve as the Class and PAGA Representative in order to help others recover these wages and penalties for what I believe were the Labor Code violations that had been committed against us.

5. After agreeing to serve as a Class and PAGA representative I spoke with my attorneys extensively on a wide variety of subjects about my employment with Defendant including how things were run on a day-to-day basis, Defendant's policies and practices relating

1 to meal and rest periods, how I was compensated, and the training I was provided, both with  
2 respect to my job duties generally, and with respect to Defendant's employment practices.

3 6. In addition to these initial conversations, I had several follow up discussions with  
4 my attorneys throughout the case when they encountered a problem or needed additional  
5 information. I tried to make myself available and provide my attorneys with any additional  
6 information they needed.

7 7. At my counsel's request, I searched for and produced documents I had related to  
8 my employment with Defendant and spent several hours looking for any old documents I'd kept  
9 from my employment in order to help with the prosecution of the case. Prior to both mediations,  
10 I had extensive discussions with my attorneys regarding Defendant's employment policies and  
11 practices. I helped my attorneys prepare the mediation briefs by providing specific examples based  
12 on my experiences working for Defendant including times I was unable to receive my meal and  
rest breaks and the reasons I was unable to take my breaks.

13 8. When the case settled, I reviewed the Settlement Agreement and discussed its  
14 terms with my attorneys. In addition, I kept in contact with my attorneys throughout the settlement  
15 process and provided additional information when Class Counsel reached out to me.

16 9. In total, between performing my own research, searching for and gathering  
17 documents, reviewing and verifying discovery, communicating with my attorneys, reviewing the  
18 settlement and discussing its terms, I estimate I spent at least 21 hours working on this matter.

19 10. I believe I took on a substantial risk agreeing to serve as the Class and PAGA  
20 representative in this matter despite being made aware that there was no certainty regarding the  
21 outcome of the case or how long the case would ultimately take.

22 11. Since filing this Action, I have understood I was representing the Class and the  
23 California Labor and Workforce Development Agency and considered the interests of the Class  
24 and LWDA just as I would consider my own interests. I understood that I must put these interests  
25 before my own and that even if we were able to successfully recover any penalties most of these  
26 penalties would be paid to the State.

27 12. I am aware that the lawsuit is public and that my name would be associated with  
28

1 the lawsuit. Although I was concerned and afraid about being the Class and PAGA representative  
2 in this public lawsuit, I decided to put my own interests aside and bring a lawsuit that would be  
3 beneficial not just for myself but for all employees and the State.

4 13. I have not yet suffered any adverse consequences as a result of this lawsuit, but  
5 neither have I received any benefit for representing the Class for the help I provided my attorneys.

6 14. In addition to the substantial time that was spent on this matter, I have also agreed  
7 to a much broader general release of all claims I may have against Defendants, rather than the  
8 more limited release agreed to by the Class.

9 15. I believe that I have done everything that my attorneys have asked of me and have  
10 tried, to the best of my ability, to represent the Class, the State, and Aggrieved Employees. I think  
11 my efforts helped get the result obtained in this case. Accordingly, I respectfully request that the  
12 Court award me a Class Representative Enhancement payment in the amount of \$7,500.00 for my  
13 active participation in this case.

14 16. Taking into consideration the time I have dedicated to the litigation, the risks I took  
15 in order to recover on behalf of not just myself but others, and the general release I have entered  
16 on my own behalf, I believe that this amount is reasonable.

17 17. I am not related to anyone associated with Protection Law Group, LLP.

18 18. I have not entered into any undisclosed settlement agreements, nor have I received  
19 any undisclosed compensation in this case. The only compensation I will receive is whatever  
20 amount the Court awards as enhancement and my share of the Class and PAGA payment.

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

23 Executed on 5/5/2025

DocuSigned by:



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Yolanda Ponce