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Attorneys for Plaintiff Lindsay Orin
and Proposed Class Counsel

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

LINDSAY ORIN, on behalf of
herself and all others similarly
situated and on behalf of the general
public,

Plaintiff,

v.

CAL. DEL. U.S.A. INC., a
California corporation, and DOES 1
through 10, inclusive,

Defendants.

Case No. 2:23-cv-03404-FMO-KS

Assigned To: Fernando M. Olguin
Courtroom: 6D

CLASS ACTION

**DECLARATION OF LINDSAY ORIN
IN SUPPORT OF UNOPPOSED
RENEWED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT**

Date: April 18, 2024

Time: 10:00 a.m.

Courtroom: 6D

Judge: Fernando M. Olguin

1 I, LINDSAY ORIN, hereby declare and state as follows:

2 1. I am the named Plaintiff in this lawsuit against Defendant Cal. Del.
3 U.S.A. Inc. ("Defendant") and I submit this declaration in support of Plaintiff's
4 Unopposed Renewed Motion for Preliminary Approval of Class Action Settlement.
5 I am a competent adult and worked for Defendant as a non-exempt employee in Los
6 Angeles County and worked during the relevant time period. I have personal
7 knowledge of the facts set forth herein, and if called as a witness to testify to them,
8 I could and would do so competently.
9

10 2. I contacted my current attorneys when I questioned the employment
11 practices of Defendant prior to commencing this lawsuit. I accepted the opportunity
12 to act as a Class Representative in a class action on behalf of other employees of
13 Defendant whom I believed were being subjected to labor law violations. Although
14 presented with the opportunity, I did not pursue this case on an individual basis and
15 instead did so as a class action so that I could help other employees recover for what
16 I believed were Defendant's illegal practices.
17

18 3. Specifically, I questioned Defendant's policies of failing to pay all
19 wages due, failing to provide meal and rest periods, failing to reimburse business
20 expenses, issuing its employees deficient wage statements, and failing to timely pay
21 its employees all wages due upon separation of employment. Through many
22 discussions with my lawyers, I learned these may be illegal practices and
23 Defendant's employees might have recourse for them.
24

25 4. By bringing this lawsuit, and throughout its course, I have put the
26 interests of the class ahead of my own. I understood that I could possibly earn a
27 small enhancement payment if this case resolved itself favorably, but always knew
28

1 that I could also be responsible for paying Defendant's attorneys' fees and costs if
2 it did not. My goal in bringing this lawsuit was to obtain a recovery on behalf of the
3 class, and even more importantly, to put an end to what I believed were illegal
4 practices on the part of Defendant. I believe I have achieved both through this
5 lawsuit and settlement.
6

7 5. I am very happy about the results of this litigation. I am satisfied that
8 Defendant is compensating class members for unpaid wages and expense
9 reimbursement, penalties, and interest that I believe we are due.
10

11 6. At the onset of this case, I spent time through numerous phone calls with
12 several of my attorneys explaining what I understood to be the policies and
13 procedures of Defendant and how they were applied to me and others I worked with.
14 During the course of this litigation, up through and following the settlement process,
15 I kept actively involved with its status, tracking the status of the case and
16 participating as much as possible.
17

18 7. It is my understanding that the employee handbook provided to me at
19 the beginning of my employment with Defendant was provided to all employees in
20 California and that the policies were applied uniformly to all California employees.
21

22 8. While I have not maintained detailed time records of my activities in
23 connection with this litigation, I believe that have spent a total of approximately 25
24 hours assisting my attorneys with the preparation of this case, and doing work and
25 analysis independent from my attorneys both before and during this case, including
26 conducting an independent investigation of the facts and providing information
27 based off my experiences before the Parties participated in a full-day mediation.
28

1 9. Before this litigation commenced, and throughout its course, I have
2 spent approximately 12.5 or more hours gathering, organizing, and reviewing
3 documents and information for this lawsuit. I sifted through many of my own
4 documents and reviewed information produced by Defendant as part of this case.

5
6 10. I have communicated with my attorneys several times per month to track
7 my case's status. I have taken an active involvement in this matter throughout its
8 course, including assistance to my attorneys prior to the mediation.

9 11. This lawsuit will almost certainly result in reputational harm to me.
10 There is a stigma associated with suing anyone, let alone your former employer. I
11 will probably be adversely affected when it comes to obtaining future employment
12 – employers who learn that I sued Defendant in a class action will likely avoid hiring
13 me.
14

15 12. I do not believe that I have any conflicts with other members of the class.
16 My interests in bringing this lawsuit – for Defendant to change its labor practices
17 going forward and to compensate current and former employees – are the same as
18 those of all other class members.
19

20 I declare, under penalty of perjury, under the laws of the State of California
21 and the United States of America that the foregoing is true and correct.

22 Executed on 03 / 13 / 2024 at West Hollywood, California.

23
24 
25 _____
26 LINDSAY ORIN
27
28