

Brandon Brouillette (SBN 289601)
bbrouillette@crosnerlegal.com
Zachary M. Crosner (SBN 272295)
zach@crosnerlegal.com
CROSNER LEGAL, PC
9440 Santa Monica Blvd, Suite 301
Beverly Hills, California 90210
Tel: (866) 276-7637
Fax: (310) 510-6429

Attorneys for Plaintiffs
[Additional Attorneys Listed on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

SOMALIA GOODWIN, JUAN CARLOS
QUEVEDO, DUSTIN JOHNSON and JOHN
A. MCGEHEE, as individuals on behalf of
themselves and on behalf of all others
similarly situated,

Plaintiffs,

v.

SAVE MART SUPERMARKETS, LLC, a
California Limited Liability Company; and
DOES 1-100, inclusive,
Defendants.

Case No.: (Lead) STK-CV-UOE-2023-2062;
SCV-273343 (MCGEHEE class action) filed
in Sonoma County; SCV-273793
(MCGEHEE PAGA action) filed in Sonoma
County

**DECLARATION OF SOMALIA
GOODWIN**

Date: March 25, 26, 27, April 1, 2
Time: 9:00AM
Dept.: 10D

JAMES HAWKINS APLC
James R. Hawkins (#192925)
Gregory Mauro (#222239)
Michael Calvo (#314986)
Lauren Falk (#316893)
Ava Issary (#342252)
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.: (949) 387-7200
Fax: (949) 387-6676
Email: James@jameshawkinsaplc.com
Email: Greg@jameshawkinsaplc.com
Email: Michael@jameshawkinsaplc.com
Email: Lauren@jameshawkinsaplc.com
Email: Ava@jameshawkinsaplc.com

Attorneys for Plaintiff JOHN A. MCGEHEE

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Sean M. Blakely (SBN 264384)
sblakely@haineslawgroup.com
Alexandra R. McIntosh (SBN 320904)
amcintosh@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Telephone: (424) 292-2350
Facsimile: (424) 292-2355

Attorneys for Plaintiff JUAN CARLOS QUEVEDO

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP
Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Aparajit Bhowmik (State Bar #248066)
Nicholas J. De Blouw (State Bar #280922)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Website: www.bamlawca.com
Blumenthal Nordrehaug Bhowmik De Blouw LLP

Attorneys for DUSTIN JOHNSON

1 I, Somalia Goodwin, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiffs' Motion for Approval of Settlement under the Private
5 Attorneys General Act.

6 2. I worked for Defendant Save Mart for about three months in 2022 as a Deli Clerk.
7 While I worked there I don't think I was paid for all hours that I worked because sometimes I
8 had to work after clocking out in order finish up the day's tasks, and I was not paid for this
9 additional time. I also don't think I received all of the meal and rest breaks I was entitled to, as
10 lunches and breaks would start late, last less than 30 minutes, or be interrupted by work.

11 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
12 employee of Defendants, especially with regard to me not receiving all of the pay I believe I
13 earned, and for not getting all of my lunches and other breaks.

14 4. It is my understanding this lawsuit could not have been prosecuted or settled on
15 behalf of the Class unless I or some other current or former employee decided to serve as a
16 named plaintiff. In deciding to serve as a named plaintiff in this case, I understood that my name
17 could be publicly attached to this lawsuit and that my work experiences to some extent would be
18 set forth in a public court file. I recognized I would need to devote a certain amount of time that I
19 could have spent otherwise. I also recognized my bringing the lawsuit carried some degree of
20 risk for defendants' legal costs among other things. Despite this, I decided to serve as the named
21 plaintiff without any promise of recovery or compensation.

22 5. I am familiar with the work involved in prosecuting this case. I have participated
23 in meetings, phone calls, and other communications with my lawyers regarding this case. I am
24 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
25 events in this case, including the investigation performed by my lawyers, the mediation with
26 Defendant that resulted in this settlement, and the preparation of settlement papers and the need
27 to obtain court approval of the proposed settlement. I participated in the litigation and provided
28 my lawyers with information and documents regarding my employment with Defendant.

1 6. I believe that the proposed settlement obtained on behalf of the State and other
2 aggrieved employees is excellent in view of the issues and risks involved with the case.

3 7. I believe I have fulfilled my duties as a proposed class representative, which
4 required a significant amount of time and effort during the course of this case. These efforts
5 required dedicating numerous hours to lawsuit activities including, but not limited to: (a)
6 communicating with my attorneys to stay informed of ongoing developments in the case and to
7 discuss the proposed settlement ultimately negotiated; (b) searching for and providing documents
8 and other materials relating to my work experience; (c) responding to requests for information
9 relating to my work experience; and (d) reviewing filings and key documents including drafts of
10 the complaint and the settlement agreement. These tasks required my dedication of at least 15-20
11 hours of my time, which time I honestly could have spent on family, personal time, or work. My
12 understanding is that future tasks may require several more hours of my time. Further, at all
13 times I was ready, willing and able to testify at deposition and/or trial. I believe I have been
14 diligent and that I have acted above and beyond that of which is expected of a named plaintiff
15 and proposed class representative to date and will continue to do so. To the best of my
16 knowledge I have not conflicts of interest of any kind with any other class member.

17
18 8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as the
19 named plaintiff and PAGA representative, and in consideration for my general release of all
20 claims against Defendants. I believe that amount is fair and reasonable in view of the work I
21 have and will continue to perform on behalf of the Class. I believe that my role as the class
22 representative in this lawsuit has resulted in a valuable benefit to the State and other aggrieved
23 employees, and I accepted the potential risk of being liable for the opposing parties' costs if we
24 were unsuccessful in this lawsuit. I believed in this case, so I was willing to be the named
25 plaintiff to risk this and pursue this class action litigation. I also accepted the risk that news of
26 this lawsuit could also potentially impact my ability to secure other work.
27
28

9. Based on the time, service, risk, stress, potential stigma, loss of benefits and excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed on 01 / 15 / 2025, at Stockton, California.

Somalia Goodwin

SOMALIA GOODWIN