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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN JOAQUIN**

10
11 SOMALIA GOODWIN, JUAN CARLOS
12 QUEVEDO, DUSTIN JOHNSON and JOHN
13 A. MCGEHEE, as individuals on behalf of
themselves and on behalf of all others
similarly situated,

14 Plaintiffs,

15 v.

16
17 SAVE MART SUPERMARKETS, LLC, a
California Limited Liability Company; and
18 DOES 1-100, inclusive,
19 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 JUAN CARLOS
QUEVEDO IN SUPPORT OF
APPROVAL OF CLASS ACTION
SETTLEMENT**

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

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I, Juan Carlos Quevedo, declare as follows:

1. I am an individual over the age of 18 and am one of the named plaintiffs in this matter. This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant Save Mart Supermarkets LLC (“Defendant”) as a non-exempt “Meat Cutter” from approximately March 2021 until approximately June 2023 at Defendant’s Contra Costa location. During my employment with Defendant, I was subject to Defendant’s wage and hour policies and practices that are at issue in this case.

3. During my employment with Defendant, I received various incentive pay and bonuses, including payments denoted as "PREMIUM," "Temp Bns," "HOL/PREM", Service Awards, and other pay during my employment with Defendant. However, I do not believe Defendant included these payments when calculating my overtime wages, and as a result, I was underpaid the overtime wages I was owed. I also did not always receive a timely lunch break before the end of my fifth hour of work due to my job responsibilities and work demands. I also did not always receive a second lunch break when I worked shifts over 10 hours. I also was not always able to take my 10-minute rest breaks due to work demands and staffing shortages at my location. I also do not believe that Defendant paid me all sick pay I was entitled to during my employment with Defendant. As a result of these violations, it is my understanding that I did not receive accurate paystubs and did not receive all wages that were owed to me when I stopped working for Defendant. I also believe that the paystubs issued by Defendant were deficient in that they did not list all rates of pay and number of hours worked at each rate of pay.

4. I have been actively involved in this case since I first retained Haines Law Group, APC (“HLG”) in 2023. On November 27, 2023, I filed a class action lawsuit against Defendants Save Mart Supermarkets LLC and Save Mart Companies LLC in Contra Costa Superior Court, Case No. C23-02995. Without waiving the attorney-client privilege, prior to filing my lawsuit, my attorneys explained my role and responsibilities as a Class Representative, and I understand

1 my responsibilities as a Class Representative. Since retaining my attorneys, I have had many
2 discussions with the attorneys and staff at HLG, including discussions regarding Defendant's
3 wage and hour practices and my claims in this case, potential witnesses, litigation strategy,
4 updates on how the case was proceeding, the Settlement, and how I could help the case and
5 potential Class Members. I also gathered and reviewed documents for use in the lawsuit and
6 reviewed relevant documents with my attorneys. I estimate that I have spent at least 25-30 hours
7 on this case from the time I first spoke with my attorneys regarding this case until the present. I
8 also understand that as part of the Settlement, I have agreed to a general release of claims against
9 Defendants, which is broader than the release of claims agreed to by other Class Members.

10 5. When this lawsuit was filed, I understood that this lawsuit could benefit former
11 and current employees by helping to recover their unpaid wages, unpaid meal and rest period
12 premiums, and other penalties. I knew there was a risk that I could be liable for Defendant's costs
13 if we lost the case. I accepted this risk because I wanted Defendant to pay its current and former
14 employees for their unpaid wages and penalties. Even though I understood that filing a lawsuit is
15 a public record, I accepted that burden in order to help former, current, and future employees. As
16 far as I am aware, I have no actual or potential conflicts with any of the Class Members.

17 6. I understand that my attorneys will request that the Court approve a Class
18 Representative Enhancement Payment of \$10,000.00 for my efforts on behalf of the Settlement
19 Class. I believe this amount is reasonable based on the amount of time and effort I have devoted
20 to this case and the risks I have undertaken as a class representative, as described above. My
21 support for the Settlement is not contingent on me receiving this enhancement payment.

22 I declare under penalty of perjury under the laws of the State of California and the United
23 States that the foregoing is true and correct. Executed on 01/14/25, 2025 in
24 Richmond, California.

25 

26 Juan carlos Quevedo (Jan 14, 2025 11:53 PST)

27 Juan Carlos Quevedo