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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
CENTRAL DISTRICT**

**SALVADOR RODRIGUEZ, GERMAN
RODRIGUEZ**, on Behalf of Themselves and
All Other Current and Former Employees
Similarly Situated,

Plaintiffs,

v.

WNU LLC DBA PAPA JOHNS, a
Washington Limited Liability Company,
PAUL URBINA, BRISIA OCHOA,
Individuals, and **DOES 1 to 50, Inclusive.**

Defendants.

CASE NO. 23STCV28934

*Assigned for All Purposes to the Honorable
William F. Highberger*

Dept. No. 10

**DECLARATION OF ELI M. KANTOR
REGARDING CY PRES RECIPIENT**

Hearing Date:
Hearing Time: 10:30 AM
Place:
Action Filed: November 22, 2023
Trial Date: Not Set

I, ELI M. KANTOR, declare as follows:

1. I make this declaration regarding the *cy pres* recipient as part of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement. I am an attorney licensed to practice law in all courts in the State of California, and I am also admitted to practice before the United States District Courts for the Central District and Southern District of California, and the Ninth Circuit Court of Appeals, and have been an active member of the California State Bar since 1976. The facts contained herein are based upon my own personal knowledge. If called upon to testify, I would testify to these same facts.

2. I am the attorney of record for Plaintiffs and the Class Members in SALVADOR RODRIGUEZ, et al. v. WNU LLC DBA PAPA JOHNS, et al. Los Angeles County Superior Court Case No. 23STCV28934.

3. Per the Settlement Agreement in the above-captioned case, if any Participating Class Members do not cash their Settlement checks within one hundred and eighty (180) days after issuance, then at that time the Claims Administrator will void any such uncashed or unclaimed checks.

4. The Claims Administrator will take additional reasonable steps, including a skip-trace or other search using the name, address, and social security number of the Class Member involved, to locate such persons for a period of up to forty-five (45) days.

5. After such time, the Claims Administrator will disburse or cause to disburse all remaining balance of Non-Reversionary Settlement Fund plus any interest on that sum at the legal rate of interest from the date of entry of the initial judgment to the Legal Aid

1 Foundation of Los Angeles, specifically to the fund designated as “Legal Aid Foundation of
2 Los Angeles, General Support.”

3 6. The Legal Aid foundation of Los Angeles is a nonprofit organization which
4 promotes justice and the law for all Californians.

5
6 7. I do not have an interest or involvement in the governance work of this *cy pres*
7 recipient.

8 8. I am not aware that any party or counsel in this case has an interest or
9 involvement in the governance work of this *cy pres* recipient,
10

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

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14
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16 Dated: August 7, 2025



ELI M. KANTOR