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7 Attorneys for Plaintiff(s),

8 NATALIAH DEVOL GREEN, and all others similarly situated

9 (Additional attorneys for Plaintiff(s) on following page)

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **FOR THE COUNTY OF LOS ANGELES**

13 **(UNLIMITED JURISDICTION)**

14
15 NATALIAH DEVOL GREEN, on behalf of
16 herself and all others similarly situated, and the
general public,

17 *Plaintiff(s),*

18 vs.

19 MORGAN COOKIE GROUP CULVER LLC, a
20 California limited liability company; MORGAN
21 COOKIE GROUP LLC, a California limited
22 liability company; CRUMBL LLC, a Utah
23 limited liability company; POCKETS SMITTY
CORONA LLC, a Utah limited liability
company; and DOES 1–50, inclusive,

24 *Defendant(s).*
25
26
27
28

Case No. 23STCV11939

**SUPPLEMENTAL DECLARATION
OF NATALIAH DEVOL GREEN IN
SUPPORT OF PLAINTIFF’S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**



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1 **SUPPLEMENTAL DECLARATION OF NATALIAH DEVOL GREEN**

2

3 I, NATALIAH DEVOL GREEN, and state as follows:

4 1. I am a resident of the City of Encino, in the State of CA and am over 18 years of

5 age. I am the plaintiff in this action and am represented by David Spivak of The Spivak Law Firm

6 and Benjamin J. Smith of Smith Law in this action. Except as otherwise stated, I have personal

7 knowledge of all matters set forth in this declaration and could and would competently testify

8 thereto if called upon to do so as a witness.

9 2. I understand that, as Class Representative, I have certain duties and responsibilities

10 to the Class Members and believe that I have fairly represented the interests of all Class Members

11 during the entire course of this case.

12 3. My counsel provided me with information regarding class actions, how they work,

13 and what my duties would be as the Class Representative. I agreed to serve as a Class

14 Representative so that I could seek to recover wages and penalties on behalf of myself and other

15 employees like me.

16 4. I understand that the Settlement in this case is subject to this Court's approval to

17 ensure that it is in the best interest of the Class as a whole. I have no conflicts with the Class.

18 5. I understand that my attorneys are submitting an application to this Court for a

19 Class Representative Service Payment to compensate me for my unique contributions to the

20 success of this action as the Class Representative in the amount of \$15,000.00. I believe this

21 amount is fair and reasonable compensation for my efforts in this case and the risks I have taken

22 in pursuing a fair recovery for the Class Members.

23 6. I have provided Defendants with a general release of any and all claims, known or

24 unknown, I may have against Defendants. By agreeing to settle the case in the best interest of the

25 Class Members, I have given up the right to pursue my individual claims for unpaid wages and

26 penalties and to recover substantially more for unpaid wages, interest, waiting time penalties, and

27 pay stub penalties. I did not seek an individual settlement for my claims at all, instead choosing

28 to prosecute this matter on behalf of my coworkers. By pursuing the claims of all Class Members,



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1 I have also rendered my own individual payment uncertain and delayed its payment by several
2 months (at the least).

3 7. As Class Representative, I assumed a fiduciary role to the Class. I agreed to (1)
4 consider the interests of the Class just as I would consider my own interests and, in some cases,
5 to put the interests of the Class before my own interests; (2) actively participate in the lawsuit, as
6 necessary, by among other things, producing documents to Defendants and giving depositions
7 and trial testimony if requested; (3) travel to give such testimony; (4) recognize and accept that
8 any resolution of the lawsuit by dismissal or settlement, is subject to court approval, and must be
9 designed in the best interest of the Class as a whole; (5) follow the progress of the lawsuit and
10 provide all relevant facts to my attorneys; (6) champion many other people with similar claims
11 and injuries because of the importance of the case and the necessity that all Class Members benefit
12 from the lawsuit; and (7) fight for a resolution in which the individual recoveries to each Class
13 Member, including me, maybe relatively small. I agreed to shoulder all of these responsibilities
14 in exchange for a proportionate share of funds made available for distribution to the Class
15 Members. I had no guarantee of a Class Representative Service Payment. I have spent over 33.17
16 hours of my time in connection with this case to date. Attached as **Exhibit A** to this declaration
17 is a true and correct copy of an activity log I have prepared showing the estimates of time I spent
18 on various work performed in this case. The activities I have performed have included, but have
19 not been limited to: obtaining legal counsel, speaking with my legal counsel on numerous
20 occasions, over the phone, informing them of the terms and conditions of my coworkers'
21 employment, assisting them in gathering information, identifying the claims brought in this case,
22 gathering contact information for my former coworkers, , gathering documents from my
23 employment with Defendants, and being actively involved in the settlement process to ensure a
24 fair result for the Class as a whole. I also participated in the mediation and spent time carefully
25 reviewing the Settlement, and other case related documents on my own and with my counsel to
26 make sure that the Settlement and other work my attorneys performed are in the best interest of
27 the Class Members. I have regularly contacted my counsel to follow the progress of the case.

28 8. Further, my counsel have advised me of the possibility that, if the case was lost, I



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1 could have been ordered to pay Defendants' costs and even attorneys' fees in this case, which
2 could have been thousands of dollars by the end.

3 9. Because I filed this lawsuit, there is a public record at the Court showing that I
4 brought a class action for unpaid wages against my former employer. The Class Representative
5 Service Payment to me of \$15,000.00 is not equal to the harm to my future career prospects that
6 this case may cause me.

7 10. Based on the time, risk, stigma, loss of benefits and income and great outcome of
8 this case, I believe that the requested Class Representative Service Payment for me is fair and
9 reasonable. As such, I respectfully request that the Court award the requested Class
10 Representative Service Payment of \$15,000.00.

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

13 Executed on _____ in Encino, CA.

14
15
16 NATALIAH DEVOL GREEN,
17 Declarant
18



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28

EXHIBIT A

GREEN CLIENT TIME LOG EXHIBIT

Approximate Date	Description	Hours
7/5/2022	Reviewing documents: Retainer/FAQ	1.00
8/4/2022	Reviewing documents: Other docs from law firm	0.25
10/6/2022	Reviewing documents: Other docs from law firm	0.25
1/3/2023	Calls and/or texts with law firm	0.08
1/3/2023	Calls and/or texts with law firm	0.08
1/5/2023	Emails to/from law firm	0.17
1/5/2023	Calls and/or texts with law firm	0.50
1/5/2023	Calls and/or texts with law firm	1.00
1/9/2023	Emails to/from law firm	0.08
1/10/2023	Emails to/from law firm	0.08
2/3/2023	Emails to/from law firm	0.08
2/3/2023	Emails to/from law firm	0.08
2/6/2023	Emails to/from law firm	0.08
2/6/2023	Reviewing documents: Other docs from law firm	0.25
2/6/2023	Emails to/from law firm	0.08
2/14/2023	Reviewing documents: Other docs from law firm	0.17
2/14/2023	Emails to/from law firm	0.08
2/27/2023	Emails to/from law firm	0.08
3/9/2023	Emails to/from law firm	0.08
3/16/2023	Emails to/from law firm	0.08
3/20/2023	Reviewing documents: Other docs from law firm	0.17
3/28/2023	Reviewing documents: Retainer/FAQ	1.00
3/30/2023	Calls and/or texts with law firm	0.08
3/31/2023	Calls and/or texts with law firm	0.08
3/31/2023	Calls and/or texts with law firm	0.08
3/31/2023	Calls and/or texts with law firm	0.08
4/4/2023	Reviewing documents: Other docs from law firm	1.00
4/6/2023	Calls and/or texts with law firm	0.08
4/6/2023	Calls and/or texts with law firm	0.08
4/7/2023	Emails to/from law firm	0.08
4/10/2023	Emails to/from law firm	0.08
4/10/2023	Gathering information and/or documents	1.00
4/10/2023	Emails to/from law firm	0.08
4/12/2023	Emails to/from law firm	0.08
4/13/2023	Emails to/from law firm	0.08
4/17/2023	Emails to/from law firm	0.08
4/19/2023	Emails to/from law firm	0.08
4/21/2023	Emails to/from law firm	0.08
5/24/2023	Calls and/or texts with law firm	0.25

GREEN CLIENT TIME LOG EXHIBIT

Approximate Date	Description	Hours
5/24/2023	Calls and/or texts with law firm	0.17
5/24/2023	Reviewing documents: Complaint	1.00
5/26/2023	Reviewing documents: Other docs from law firm	0.17
6/8/2023	Emails to/from law firm	0.08
6/16/2023	Reviewing documents: Other docs from law firm	0.50
6/30/2023	Emails to/from law firm	0.08
7/19/2023	Emails to/from law firm	0.08
7/24/2023	Emails to/from law firm	0.08
7/24/2023	Calls and/or texts with law firm	0.08
8/17/2023	Calls and/or texts with law firm	0.08
8/17/2023	Calls and/or texts with law firm	0.50
8/31/2023	Emails to/from law firm	0.08
8/31/2023	Reviewing documents: Other docs from law firm	0.17
10/4/2023	Calls and/or texts with law firm	0.25
10/11/2023	Reviewing documents: Other docs from law firm	0.25
10/13/2023	Calls and/or texts with law firm	0.17
10/13/2023	Emails to/from law firm	0.08
10/13/2023	Emails to/from law firm	0.08
10/13/2023	Calls and/or texts with law firm	0.17
10/25/2023	Reviewing documents: Other docs from law firm	0.25
2/12/2024	Emails to/from law firm	0.08
2/13/2024	Calls and/or texts with law firm	0.08
2/22/2024	Calls and/or texts with law firm	0.25
2/28/2024	Calls and/or texts with law firm	0.33
3/1/2024	Calls and/or texts with law firm	0.17
3/4/2024	Reviewing documents: Other docs from law firm	1.00
3/4/2024	Reviewing documents: Other docs from law firm	0.17
3/5/2024	Emails to/from law firm	0.08
3/5/2024	Reviewing documents: Other docs from law firm	0.25
3/5/2024	Calls and/or texts with law firm	0.08
3/7/2024	Calls and/or texts with law firm	0.08
3/8/2024	Emails to/from law firm	0.17
3/8/2024	Mediation: participation time	8.33
3/11/2024	Calls and/or texts with law firm	0.25
3/11/2024	Emails to/from law firm	0.08
3/11/2024	Calls and/or texts with law firm	0.17
4/8/2024	Reviewing documents: Other docs from law firm	0.25
7/10/2024	Emails to/from law firm	0.08

GREEN CLIENT TIME LOG EXHIBIT

Approximate Date	Description	Hours
7/10/2024	Reviewing documents: Other docs from law firm	0.25
7/11/2024	Reviewing documents: Other docs from law firm	0.50
9/3/2024	Emails to/from law firm	0.08
9/5/2024	Emails to/from law firm	0.08
9/16/2024	Emails to/from law firm	0.08
9/16/2024	Emails to/from law firm	0.08
9/16/2024	Emails to/from law firm	0.08
9/16/2024	Reviewing documents: Other docs from law firm	0.25
9/27/2024	Reviewing documents: Other docs from law firm	0.25
10/14/2024	Emails to/from law firm	0.08
10/30/2024	Emails to/from law firm	0.08
11/4/2024	Emails to/from law firm	0.08
11/5/2024	Emails to/from law firm	0.08
12/5/2024	Emails to/from law firm	0.08
12/5/2024	Reviewing documents: Other docs from law firm	0.25
12/5/2024	Emails to/from law firm	0.08
12/9/2024	Calls and/or texts with law firm	0.25
12/9/2024	Emails to/from law firm	0.08
12/9/2024	Emails to/from law firm	0.08
12/9/2024	Calls and/or texts with law firm	0.25
12/20/2024	Reviewing documents: Settlement Agreement	1.00
12/20/2024	Emails to/from law firm	0.08
12/23/2024	Emails to/from law firm	0.08
12/23/2024	Reviewing documents: Other docs from law firm	0.17
1/29/2025	Emails to/from law firm	0.08
2/14/2025	Reviewing documents: Other docs from law firm	1.50
3/11/2025	Reviewing documents: Other docs from law firm	0.25
3/17/2025	Reviewing documents: Other docs from law firm	0.25
3/19/2025	Reviewing documents: Other docs from law firm	0.25
5/28/2025	Emails to/from law firm	0.08
6/12/2025	Reviewing documents: Other docs from law firm	0.50
6/18/2025	Calls and/or texts with law firm	0.25
6/23/2025	Reviewing documents: Other docs from law firm	0.33
	TOTAL	33.17