

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

Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

SOCORRO GONZALEZ, et al.,

Plaintiffs,

v.

COMPASS GROUP USA, INC., et al.,

Defendants.

Case No. 23STCV19334

**DECLARATION OF TRINITY
MARTINEZ IN SUPPORT OF MOTION
TO APPROVE PAGA SETTLEMENT**

Action Filed: August 14, 2023

1 I, Trinity Martinez, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration, and I
3 am making this declaration on behalf of myself, as a named plaintiff, and in support of the Motion to
4 Approve Private Attorneys General Act Settlement.

5 2. I worked in California as a non-exempt employee of Defendants Compass Group USA,
6 Inc., and Levy Premium Foodservice Limited Partnership; (“Defendants”) from March 2023 to May
7 2024.

8 3. I retained my attorneys who are experienced in PAGA representative action litigation
9 and claims against employers for violations of the California Labor Code. I have no personal
10 relationship or family ties to my attorneys or any officer of the Court. I am not aware of having any
11 actual or potential conflicts of interest with another aggrieved employee in this case.

12 4. I was subject to Defendants’ policies and practices that have been alleged as unlawful in
13 the Complaint and the PAGA notice sent to the Labor and Workforce Development Agency. For
14 example, I was required to remain on premises and on duty while on meal and rest breaks because I
15 was subject to random searches. I was also required to go through a security checkpoint before every
16 shift, and then I physically walked to my time clock terminal to clock in; I was not paid for any of this
17 checkpoint or transit time or for any accompanying delays.

18 5. In bringing this case for myself, the State of California, and the other employees, I
19 understood a lot of work would be required and I was willing to, and did, do the work to keep the case
20 moving forward. For instance, before the complaint was filed I spoke to my attorneys several times and
21 discussed how Defendants implemented their company policies and procedures. I also assisted my
22 attorneys in their investigation into my claims by providing them documents and answering their
23 questions. I reviewed the complaint before it was filed and after it was filed I was given access to an
24 electronic file sharing program that alerted me via email when important documents were filed so that I
25 could review them and keep up with the developments in the case. I was informed that the Defendants
26 had the right to take my deposition, and that the preparation and deposition itself could take multiple
27 days. Although my deposition was not taken, I feel I would have been adequately prepared and
28 comfortable to give testimony on my experiences.

6. My attorneys explained to me the risks and benefits of bringing a representative action. I understood that I took on the risk, both professionally and financially, in pursuing the case as a representative PAGA action.

7. A mediation took place on November 12, 2024, with Monique Ngo-Bonnicci, Esq., a well-respected and experienced mediator. The mediation resulted in an agreement to settle the action. I communicated with my attorneys regarding the terms of the settlement which was reached between the parties and understood that the recovery in this case was for the benefit of my fellow coworkers, not just for me, and therefore wanted the best possible result to be obtained for the aggrieved employees.

8. I have been actively involved with this lawsuit. Although I did not keep time records, I was in regular contact with my attorneys, reviewed court filings, and spent a significant amount of time on the issues presented during the lawsuit and in the settlement process. I estimate that I spent approximately 30-40 hours working on this case up until this point.

9. I reviewed the final PAGA Settlement Agreement and I believe it is fair and reasonable given the facts of the case.

10. I believe the \$10,000 Service Award I have requested is fair compensation for my efforts in support of this action and the risks I undertook.

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

Executed on 10/02/2025, at _____
(city, state)

2870
Trinity Martinez (Oct 2, 2025 19:44:14 PDT)
Trinity Martinez

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