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

LESLEY MUNOZ, GIOVANI ESTRELLA,
individually and on behalf of other members
of the general public similarly situated;

Plaintiffs,

vs.

UKA BIG SAVER FOODS, INC., a
California corporation; and DOES 1 through
100, inclusive;

Defendants.

Case No.: 19STCV24268
Honorable Carolyn Kuhl
Department SSC12

CLASS ACTION

**DECLARATION OF LESLEY
MUNOZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Plaintiff's Motion for Preliminary
Approval of Class Action Settlement;
Declaration of Proposed Class Counsel
(Brian J. St. John); and [Proposed] Order
filed concurrently herewith]

Date: June 5, 2024
Time: 10:30 a.m.
Department: SSC12

Complaint Filed: July 12, 2019
FAC Filed: October 26, 2020
Trial Date: None Set

DECLARATION OF LESLEY MUNOZ

I, **Lesley Munoz**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by UKA's Big Saver Foods, Inc. ("Big Saver") in an hourly-paid, non-exempt Driver from approximately February 2015 to approximately June 2016. I decided to seek legal advice about my work experiences with Big Saver. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwazian. I wanted to do whatever I could to make sure Big Saver was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 15 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 8 hours discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over 15 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Big Saver, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of hourly paid, non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Big Saver. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least 10 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Big Saver. During

1 the discovery phase of the litigation, I spent approximately 15 additional hours reviewing Big
2 Saver's discovery requests (which included one set of special interrogatories, and four sets of
3 requests for production of documents), locating documents, and providing documents and
4 responses to my attorneys.

5 5. As far as the settlement is concerned, I was available to review documents and
6 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
7 agreement and about 2 hours asking questions and discussing the potential settlement with my
8 attorneys before signing the settlement agreement.

9 6. I believe that I have done everything that my attorneys have asked of me and have
10 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
11 and the State of California. I think my efforts helped to get the result obtained in this case, and
12 as a class and PAGA representative, I respectfully request that the Court award me an service
13 payment in the amount of \$7,500.00 for my active participation in this case. Taking into
14 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

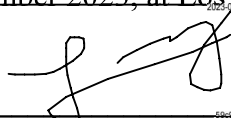
15 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this case. The only compensation I will receive is whatever amount
18 the Court awards as an enhancement payment, as well as my share of the settlement as a class
19 member and as an aggrieved employee.

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

09/05/2023

22 Executed this ____ day of September 2023, at Los Angeles, California.

23 
24 Electronically signed by Lesley Munoz on 09/05/2023 at 10:00:00 AM. The signature is a handwritten-style mark in black ink.

25 Lesley Munoz
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