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Attorneys for Plaintiff CANDICE VALENZUELA
on behalf of the State of California,
and others similarly situated and aggrieved

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

CANDICE VALENZUELA, on behalf of the
State of California, and others similarly situated
and aggrieved,

Plaintiff,

v.

KAZI FOODS, INC., a California
Corporation; and DOES 1-100, inclusive,
Defendants.

Case No.: 23STCV29564

Assigned for All Purposes to:
Hon. Colin Leis
Dept. 74

**DECLARATION OF
CANDICE VALENZUELA**

Date: December 27, 2024
Time: 8:30 am
Dept.: 74
Reservation ID: 873883866180

1
2 1. I, CANDICE VALENZUELA, declare as follows:

3 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
4 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
5 declaration in support of Plaintiff's Motion for Approval of PAGA Settlement.

6 2. I worked for defendant Kazi from about November 15, 2020 as a Cashier at
7 Defendant's Pacoima, California location. Around April 2022 I transferred to Defendant's
8 Canoga Park, California location as a temporary manager, but later transferred back to Pacoima
9 where I continue to work part-time. While working there I don't think I was paid for all hours that
10 I worked because many times I am told to clock out for a lunch break but continue working for
11 several minutes that are not paid for. I also think Kazi sometimes doesn't pay for overtime hours
12 and time and half and my overtime has been underpaid. I also don't think I received all of the
13 meal and rest breaks I was entitled to, as I mentioned many times had to perform work even
14 though I was supposed to be clocked out for a lunch, and I couldn't leave the restaurant during a
15 lunch break if I had purchased food to eat. I also had to use my own phone for company business,
16 and I never received any reimbursement.

17 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
18 employee of Defendant, especially with regard to me not receiving all of the pay I believe I
19 earned, for not getting all of my lunches and other breaks, and not getting anything for using my
20 own phone.

21 4. It is my understanding this lawsuit could not have been prosecuted or settled on
22 behalf of the other employees unless I or some other current or former employee decided to serve
23 as a named plaintiff. In deciding to serve as a named plaintiff in this case, I understood that my
24 name could be publicly attached to this lawsuit and that my work experiences to some extent
25 would be set forth in a public court file. I recognized I would need to devote a certain amount of
26 time that I could have spent otherwise. I also recognized my bringing the lawsuit carried some
27 degree of risk for defendants' legal costs among other things. Despite this, I decided to serve as
28 the named plaintiff without any promise of recovery or compensation.

1 5. I am familiar with the work involved in prosecuting this case. I have
2 participated in meetings, phone calls, and other communications with my lawyers
3 regarding this case. I am familiar with the allegations and defenses of the claims in this
4 case. I am familiar with the major events in this case, including the investigation
5 performed by my lawyers, the mediation with Defendant that resulted in this settlement,
6 and the preparation of settlement papers and the need to obtain court approval of the
7 proposed settlement. I participated in the litigation and provided my lawyers with
8 information and documents regarding my employment with Defendant.

9 6. I believe that the proposed settlement obtained on behalf of the State and other
10 aggrieved employees is excellent in view of the issues and risks involved with the case.

11 7. I believe I have fulfilled my duties as a named plaintiff and PAGA representative,
12 which required a significant amount of time and effort during the course of this case. These
13 efforts required dedicating numerous hours to lawsuit activities including, but not limited to: (a)
14 communicating with my attorneys to stay informed of ongoing developments in the case and to
15 discuss the proposed settlement ultimately negotiated; (b) searching for and providing documents
16 and other materials relating to my work experience; (c) responding to requests for information
17 relating to my work experience; and (d) reviewing filings and key documents including drafts of
18 the complaint and the settlement agreement. These tasks required my dedication of at least 15-20
19 hours of my time, which time I honestly could have spent on family, personal time, or work. My
20 understanding is that future tasks may require several more hours of my time. Further, at all times
21 I was ready, willing and able to testify at deposition and/or trial. I believe I have been diligent and
22 that I have acted above and beyond that of which is expected of a named plaintiff and proposed
23 class representative to date and will continue to do so. To the best of my knowledge I have not
24 conflicts of interest of any kind with any other class member.

25 2. 8. It is my opinion that \$7,500.00 is a fair and adequate award for my service
26 as the named plaintiff, and in consideration for my general release of all claims against Defendant.
27 I believe that amount is fair and reasonable in view of the work I have and will continue to perform
28 on behalf of the other employees. I believe that my role as the PAGA representative in this lawsuit

1 has resulted in a valuable benefit to the State and my co-workers, and I accepted the potential risk
2 of being liable for the opposing parties' costs if we were unsuccessful in this lawsuit. I believed in
3 this case, so I was willing to be the named plaintiff to risk this and pursue this class action litigation.
4 I also accepted the risk that news of this lawsuit could also potentially impact my ability to secure
5 other work.

6 3. 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and
7 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

8 I declare under penalty of perjury under the laws of California that the foregoing is true
9 and correct. Executed on 10 / 28 / 2024, at Los Angeles, California.

11 

12 Candice Valenzuela