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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

JOSHUA WOLFE, VERONICA TOPETE,
individually, and on behalf of other members of
the general public similarly situated and on
behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act;

Plaintiffs,

vs.

SOUTH COAST BAKING, LLC, a California
limited liability company; SOUTH COAST
BAKING COMPANY, an unknown business
entity; RISE BAKING COMPANY, an
unknown business entity; RISE BAKING
COMPANY, LLC, a Delaware Limited
Liability Company; RISE BAKING ARTISAN
BREAD, LLC, a Delaware Limited Liability
Company; RISE BAKING SWEET GOODS,
LLC, a Delaware Limited Liability Company;
BRILL, INC., a Delaware Limited Liability
Company; and DOES 1 through 100, inclusive,

Defendants.

Case No. CIVSB2224856

Honorable Christian Towns
Department S26

CLASS ACTION

**DECLARATION OF PLAINTIFF
VERONICA TOPETE IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Complaint Filed:	October 27, 2022
FAC Filed:	April 17, 2024
Jury Trial Date:	None Set

DECLARATION OF VERONICA TOPETE

I, Veronica Topete, declare as follows:

1. I am an adult over the age of eighteen (18) years old.

2. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.

3. I am a named Plaintiff/Class Representative in the above-captioned lawsuit, and I submit this declaration in support of Plaintiffs' Unopposed Motion Final Approval of Class Action Settlement.

4. I worked for Defendants packaging baked goods between 2015 and March 2022. I was based out of the company's Bloomington, California location and my job duties involved packing manufactured baked goods such as cookies, breads and cakes for delivery to retail locations. While I worked there, I don't think I was paid properly for all hours that because I had to spend significant time each day putting on my protective gear and work clothes at the start of my shift, and taking off my protective gear and work clothes at the end of my shift, off the clock. I also don't think I got all the meal breaks and rest breaks I was supposed to get because, if machines broke down, we would have to attend to them regardless of whether we were supposed to take a break, and often our breaks were cut short. I also received certain bonuses regularly but these weren't taken into account for calculating my overtime pay.

5. I decided to file this lawsuit because I did not feel that I was treated fairly as an employee of Defendants, especially with regard to me not receiving all of the pay I believe I earned, and for not getting all of my lunches and other breaks.

6. It is my understanding this lawsuit could not have been prosecuted or settled on behalf of the Class of employees unless I or some other current or former employee decided to serve as a named plaintiff and proposed class representative. In deciding to serve as a named plaintiff and proposed class representative in this case, I understood that my name could be publicly attached to this lawsuit and that my work experiences to some extent would be set forth in public court file. I recognized I would need to devote a certain amount of time that I could

1 have spent otherwise. I also recognized my bringing the lawsuit carried some degree of risk for
2 defendants' legal costs among other things. Despite this, I decided to serve as the named plaintiff
3 and proposed class representative, without any promise of recovery or compensation.

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

11 8. I believe that the proposed class-wide settlement obtained on behalf of the Class
12 and other aggrieved employees is excellent in view of the issues and risks involved with the case.

13 9. I believe I have fulfilled my duties as a proposed class representative, which
14 required a significant amount of time and effort during the course of this case. These efforts
15 required dedicating numerous hours to lawsuit activities including, but not limited to: (a)
16 communicating with my attorneys to stay informed of ongoing developments in the case and to
17 discuss the proposed settlement ultimately negotiated, (b) searching for and providing documents
18 and other materials relating to my work experience, (c) responding to requests for information
19 relating to my work experience, and (d) reviewing filings and key documents including drafts of
20 the complaint and the settlement agreement. These tasks required my dedication of at least 20
21 hours of my time, which time I honestly could have spent on family, personal time, or work. My
22 understanding is that future tasks may require several more hours of my time. Further, at all
23 times I was ready, willing and able to testify at deposition and/or trial. I believe I have been
24 diligent and that I have acted above and beyond that of which is expected of a named plaintiff
25 and proposed class representative to date and will continue to do so. To the best of my
26 knowledge, I have no conflicts of interest of any kind with any other class member.

27 10. It is my opinion that \$10,000.00 is a fair and adequate award for my service as the
28 named plaintiff and proposed Class Representative, and in consideration for my general release

1 of all claims against Defendants. I believe that amount is fair and reasonable in view of the work
2 I have and will continue to perform on behalf of the Class. I believe that my role as the class
3 representative in this lawsuit has resulted in a valuable benefit to the Class Members, and I
4 accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful
5 in this lawsuit. I believed in this case, so I was willing to be the named plaintiff and proposed
6 class representative to risk this and pursue this class action litigation. I also accepted the risk that
7 news of this lawsuit could also potentially impact my ability to secure other work.

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

10 I declare under penalty of perjury of the laws of the State of California that the foregoing
11 is true and correct. Executed on 03 / 27 / 2025, at Bloomington, California.

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15 VERONICA TOPETE
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