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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,

Plaintiff,

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 JOSHUA WOLFE
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
PLAINTIFF'S COUNSEL AWARD,
AND ENHANCEMENT PAYMENTS**

Date: April 22, 2025
Time: 8:30 a.m.
Department: S26

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

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I, **Joshua Wolfe**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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 Defendants South Coast Baking, LLC, Rise Baking Company, LLC, Rise Baking Artisan Bread, LLC, Rise Baking Sweet Goods, LLC, and Brill, Inc. (“Defendants”) as an hourly-paid, non-exempt employee from approximately September 2019 to approximately January 2020. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not paying their 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 10 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 9 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 23 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff, class representative, and a PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly-paid and non-exempt employees, helping develop a strategy as to what documents and information to obtain from Defendants, and obtaining updates on the status of the case. 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.

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4. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me throughout the litigation. 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 15 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 Defendants, including in preparation for, and during, mediation.

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

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me an enhancement payment in the amount of \$10,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

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

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

Executed on July²³, 2024, at Moreno Valley, California

Electronically Signed: 2024-07-23 19:55:43 UTC - 172.56.181.6



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Joshua Wolfe