

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Arman Marukyan (SBN 327150)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Joshua Wolfe

**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 Jessica Morgan
Department S26

CLASS ACTION

**DECLARATION OF JOSHUA WOLFE
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declarations of Proposed Class
Counsel (Arman Marukyan and Michael W.
Jones); Declaration of Proposed Class
Representative (Veronica Topete); and
[Proposed] Order filed concurrently
herewith]

Date: October 22, 2024
Time: 8:30 a.m.
Department:

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

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1 4. I was available to answer any questions my attorneys had, and available to speak
2 and meet with my attorneys whenever they needed me throughout the litigation. I responded to
3 them as quickly as possible and gave them as much information and identified as many
4 documents as I could. I spent at least 15 additional hours speaking with my attorneys about the
5 case, identifying potential witnesses, providing my attorneys with documents and information
6 concerning the case, and also describing policies, practices, and procedures of Defendants,
7 including in preparation for, and during, mediation.

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

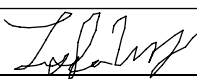
12 6. I believe that I have done everything that my attorneys have asked of me and have
13 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
14 and the State of California. I think my efforts helped to get the result obtained in this case, and as
15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

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

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

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

25
26 Executed on July²³, 2024, at Moreno Valley, California

27 
28 Electronically Signed 2024-07-23 19:55:43 UTC - 172.56.181.68
Netex AssureSign® cbac116-ed80-4db5-a71fb1b601455693

Joshua Wolfe