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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

STEPHANIE LA GROW, TIMOTHY  
GRIFFIN, and DAMIR BARIC, individuals,  
on behalf of all others similarly situated,

Plaintiff,

v.

JETBLUE AIRWAYS CORPORATION, a  
Corporation; and DOES 1 through 50,  
inclusive,

Defendants.

**Case No. 23STCV28880**

**DECLARATION OF STEPHANIE LA  
GROW IN SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
SETTLEMENT**

Hearing Date: December 11, 2025

Hearing Time: 9:00 a.m.

Judge: Hon. Laura A. Seigle

Dept.: 17

Action Filed: November 17, 2023

Trial Date: None Set

1 I, Stephanie La Grow, declare as follows:

2 1. I am over the age of eighteen, a Plaintiff and a proposed Class Representative in the above-  
3 entitled matter. I submit this declaration in support of the Motion for Preliminary Approval of Class  
4 Settlement and in support of my application for a class representative service payment.

5 2. I have personal knowledge of all the facts stated herein. I could and would competently  
6 testify under oath to these facts in court if requested to do so.

7 3. I have worked for the defendant JetBlue Airways Corporation (“JetBlue”) in California  
8 since September of 2018 and have been classified by JetBlue as a non-exempt employee.

9 4. I retained my attorneys who are experienced in both class action and PAGA representative  
10 action litigation and claims against employers for violations of the California Labor Code. I have  
11 no personal relationship or family ties to my attorneys or any officer of the Court. I am not aware  
12 of having any actual or potential conflicts of interest with another class member in this case. I am  
13 not aware of any other pending matter or action asserting claims that will be extinguished or  
14 adversely affected by this settlement.

15 5. I decided to file this class action lawsuit and be a plaintiff/class representative because I felt  
16 that my legal rights as an employee and others like me were violated. For example, I was forced to  
17 work before and after clocking in, as I commonly had to arrive to work at least five minutes prior  
18 to my shift in order to timely clock in. I also was often forced to work off the clock after clocking  
19 out for the day, as I engaged in post shift paperwork that I was unable to complete during regular  
20 working hours. Further, I did not always receive compliant meal and rest breaks which were often  
21 late, short or missed entirely – and when these violations occurred, I did not receive break penalty  
22 payments I was entitled to. Additionally, I was not reimbursed for the use of my personal cell phone  
23 which was an essential tool necessary to perform my job duties.

24 6. I spoke to my attorneys several times and discussed how JetBlue implemented its company  
25 policies and procedures. I also assisted my attorneys in their investigation into my claims by  
26 providing them documents and answering their questions. I reviewed the complaint before it was  
27 filed and was given access to an electronic file sharing program that alerted me via email when  
28 important documents were filed so that I could review them and keep up with the developments in

1 the case which I understood was one of my duties as a class representative. I could also access court  
2 filings from this case on my attorney's law firm website. Also, I was informed that JetBlue had the  
3 right to take my deposition, and that the preparation and deposition itself could take multiple days.  
4 Although my deposition was not taken, I feel I would have been adequately prepared and  
5 comfortable to give testimony on my experiences.

6 7. Even though this action is in the process of settling, I was and remain prepared to perform  
7 all the duties of a class representative. I understand that as a class representative I have assumed a  
8 fiduciary responsibility to prosecute this class action on behalf of the absent class members. I have  
9 understood that as a fiduciary, I have a duty to prosecute this action for the benefit of the class  
10 members and surrender any right to compromise the group action for an individual gain.

11 8. I understood that being a plaintiff/class representative in this case meant that I was seeking  
12 damages not only for myself but also other current and/or former non-exempt employees working  
13 for JetBlue in California who make up the class. I felt that these individuals were not aware of their  
14 labor law rights and even if they were they would probably be apprehensive about speaking up or  
15 even simply because of the time, effort and risk involved in filing a class action lawsuit.

16 9. I understood that being a part of this lawsuit involved risks. For example, my attorneys  
17 explained to me that if the case went to trial and we lost, I could be held responsible to pay for all  
18 or part of the attorney fees and costs paid by JetBlue to defend this lawsuit. Also, I knew there was  
19 a risk that future employers, if they ever find out about this lawsuit, could hold it against me or  
20 downgrade me as a potential hire. As a named Plaintiff in this case, it would not be difficult for a  
21 future employer to become aware that I sued a former employer for labor law violations. Ultimately,  
22 I decided these risks were worth it and decided to fight for my rights and the rights of others  
23 regardless of the risks, time and effort I spent on this case.

24 10. During the lawsuit I stayed in touch with my attorneys by phone and email. I also kept up  
25 to date on important developments by reviewing court filings that were made available to me  
26 electronically as I described above.

27 11. A mediation took place on May 21, 2025, with John D. Andrews, Esq., a well-respected  
28 and experienced mediator of wage and hour class actions. After the mediation the parties were able

1 to come to an agreement to settle the action based on a mediator's proposal. I communicated with  
2 my attorneys regarding the terms of the settlement which was reached between the parties and  
3 understood that I was representing absent class members and therefore wanted the best possible  
4 result to be obtained for the class members and I believe a very positive result was in fact achieved  
5 via settlement. I reviewed and signed the Memorandum of Understanding on June 13, 2025. When  
6 the final settlement agreement was ready, I reviewed it closely and signed it.

7 12. I have been actively involved with this lawsuit performing the duties described above.  
8 Although I did not keep time records, I was in regular contact with my attorneys, reviewed court  
9 filings and spent a significant amount of time on the issues presented during the lawsuit and in the  
10 settlement process. I estimate that I spent approximately 30-40 hours working on this case up until  
11 this point. I believe I have been diligent and have done what is expected of a named plaintiff and a  
12 proposed class representative to date, and will continue to do so. I have and always will maintain  
13 the best interest of the class members.

14 13. My attorneys explained to me that the settlement process involves a two-step review by the  
15 Court to determine whether the settlement is fair before approving the settlement. I know this  
16 process also involves notifying all class members of the settlement terms and of their rights to make  
17 a claim for their settlement share, to opt out of the settlement or to object to the settlement.

18 14. I believe I did the right thing by filing this case on behalf of the class members who, subject  
19 to court approval, are in line to receive monetary payments as a result of this case and settlement.  
20 This is money they may never have ever gotten if I did not pursue this action on their behalf. I feel  
21 significant personal satisfaction to know that I played a role in the class members being entitled to  
22 monetary payments as a result of the filing of this lawsuit. I also believe that the requested class  
23 representative service award of \$10,000 from the settlement is fair compensation for the work I  
24 performed and the risks I undertook.

25 15. In light of all the time and effort I have spent on this case, the risk I undertook by suing a  
26 former employer, the exposure to being responsible for paying JetBlue costs in the event we did not  
27 win the case, the reputational risk that future employers may hold this lawsuit against me, and in  
28 light of the size of the settlement, I believe the request for \$10,000 as a class representative service

1 payment is fair and reasonable.

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

4 Executed on 10/08/2025, at Whittier, CA.  
5 (date) (city, state)

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7 Stephanie La Grow  
8 Stephanie La Grow

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