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Attorneys for Plaintiff JOHN PRICE,
individually and on behalf of others
similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO

JOHN PRICE, individually and on behalf of
others similarly situated,

Plaintiff,

vs.

FORT POINT BEER COMPANY; and DOES
1 through 25, inclusive,

Defendants.

Case No.: CGC-23-610592
[Consolidated with Case No. CGC-24-611779]

Honorable Jeffrey S. Ross
Department 613

**DECLARATION OF PLAINTIFF
JOHN PRICE IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: January 6, 2026
Time: 9:00 a.m.
Dept: 613

Complaint Filed: November 21, 2023
Trial Date: Not Set

1 **DECLARATION OF JOHN PRICE**

2 I, John Price, declare and state as follows:

3 1. I am over the age of eighteen (18) and a resident of the State of California. I am the
4 named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements
5 set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

6 2. I was employed by Defendant Fort Point Beer Company ("Defendant") as an hourly-
7 paid, non-exempt Server from approximately April 2022 to approximately January 2023.

8 3. Because I thought the practices at Defendant may not be lawful, I decided to seek legal
9 advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my
10 grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps
11 to make sure Defendant was held accountable for not properly compensating its employees for all
12 hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also
13 investigated class and representative action lawsuits on my own. Thereafter, I further consulted with
14 the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits
15 under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA
16 action so that I understood what I was considering doing.

17 4. I have regularly conferred with my attorneys regarding the case as part of my
18 responsibilities as a class and PAGA representative. This process included searching for and providing
19 documents concerning my employment with Defendant, answering any questions my attorneys had
20 about the documents, providing information regarding the company's practices and the duties of other
21 hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what
22 additional documents and information they could seek to obtain from Defendant.

23 5. I routinely checked in with my attorneys and their staff to make sure that they had all
24 of my most current information and any additional information that I had obtained. I made myself
25 available to answer any questions my attorneys had about Defendant's practices and treatment of its
26 employees whenever they needed me. I responded to them as quickly as possible and gave them as
27 much information as I could.

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1 6. I believe my claims are typical of the Class because Defendant engaged in a pattern
2 and practice of wage abuse against its hourly-paid and/or non-exempt employees, such as requiring
3 myself and the other Class Members to work off-the-clock without compensation, failing to properly
4 pay overtime wages and minimum wages for all hours worked, failing to provide all meal and rest
5 breaks to which we were entitled and failing to pay meal and rest break premiums when due, failing
6 to timely pay wages during employment and upon termination of employment, failing to provide all
7 accrued gratuities, failing to provide accurate wage statements, and failing to reimburse necessary
8 business-related expenses.

9 7. I understood that in the event this matter did not settle and proceeded with trial, I would
10 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
11 responsibilities that are necessary for this lawsuit.

12 8. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
13 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
14 also understood there was a risk of losing any job and/or income due to the time that I would have to
15 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In
16 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
17 claim or take the risk that I took in bringing this action.

18 9. I reviewed the settlement agreement, discussed the settlement agreement with my
19 attorneys, and asked them questions before signing it.

20 10. I believe that I have done everything that my attorneys have asked of me and tried, to
21 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
22 I have spent approximately 40-45 hours participating in this case as described above. I believe my
23 efforts helped get the result obtained in this case.

24 11. I understand that any resolution of this lawsuit on a class wide basis is subject to court
25 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
26 throughout the course of this litigation I have considered the interests of the Class and put them before
27 my own personal interests. I believe I have adequately represented the Class and will continue to do
28 so throughout the course of this litigation.

12. I understand that incentive or enhancement awards are discretionary and intended to compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA action, and an acknowledgment of the benefits resulting from the representative's actions. I believe my work in this matter is meritorious on these points for the reasons set forth above.

13. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of \$10,000.00 for my efforts and active participation in the case and for the broader, general release of all claims that I have or may have against Defendant in connection with the settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

14. I am not related to anyone associated with Blackstone Law, APC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 12/03/2025, at San Francisco, California.

John Price

John Price