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Attorneys for Plaintiff CORINA MARTINEZ,
individually, and on behalf of Aggrieved
Employees pursuant to the California
Private Attorneys General Act

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CRUZ

CORINA MARTINEZ, individually, and on
behalf of Aggrieved Employees pursuant to
the California Private Attorneys General Act,

Plaintiffs,

vs.

STAGNARO BROS. SEAFOOD, INC., a
California corporation; and DOES 1 through 25,
inclusive,

Defendants.

Case No. 24CV00082

*Assigned for all purposes to Hon. Timothy Schmal,
Dept. 10*

**DECLARATION OF CORINA MARTINEZ
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA SETTLEMENT
AND AWARD OF ATTORNEYS' FEES AND
COSTS, GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: November 27, 2024

Time: 8:30 a.m.

Department: 10

Complaint Filed: January 8, 2024

Trial Date: None Set

DECLARATION OF CORINA MARTINEZ

I, Corina Martinez, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-entitled action. 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 Defendant Stagnaro Bros. Seafood, Inc. ("Defendant") as an hourly-paid, non-exempt Server from approximately June 2023 to October 2023.

3. During my employment, I questioned whether Defendant was paying its employees correctly and I believed that I, along with other employees, were not being allowed to take meal and rest breaks lawfully, among other things. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, not providing employees with lawful meal and rest breaks, not reimbursing employees for business expenses, and other related violations.

4. As a result, I decided to seek legal advice about my experience working for Defendant and to obtain information about filing a lawsuit to redress these grievances. In that regard, I contacted Blackstone Law, APC and spoke with their attorneys to gain a better understanding of what it meant to bring a lawsuit under the California Labor Code Private Attorneys General Act of 2004 ("PAGA"). After speaking with them, I decided to retain Blackstone Law, APC to proceed with this representative action pursuant to PAGA.

5. I have regularly communicated with my attorneys regarding the case and in order to fulfill my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with Defendant, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other non-exempt employees, and helped determine what other documents and information they could obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my current information so that they could always reach me, and to provide any additional information that I had obtained.

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1 6. I was always available to answer any questions my attorneys had and to speak and meet
2 with my attorneys whenever they needed me. I responded to them as quickly as possible and gave
3 them as much information as I could. I described Defendant's policies, practices, and procedures and
4 helped my attorneys prepare for and participate in mediation.

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

8 8. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
9 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
10 also understood there was a risk of losing any current job and/or income due to the time that I would
11 have to miss work in order to fulfill my duties and responsibilities in this matter, including having to
12 attend the trial, if needed. Most importantly, I believe that by pursuing this case, I have taken a
13 significant risk because future employers can easily find out that I sued my prior employer, and that
14 may negatively impact my ability to find employment within this industry – and even outside of it –
15 in the future. In contrast, the other employees who will be receiving money from this lawsuit did not
16 have to file a claim or take the risk that I took in bringing this action.

17 9. I reviewed the settlement agreement in this matter and discussed it with my attorneys
18 before I signed it.

19 10. I believe that I have done everything that my attorneys have asked of me and tried, to
20 the best of my ability, to seek relief for the Aggrieved Employees and the State of California. In total,
21 I have spent approximately 30 to 35 hours participating in this case as described above. I think my
22 efforts helped to get the result obtained in this matter.

23 11. I understand that any resolution of this lawsuit on a representative basis is subject to
24 court approval. At all times throughout the course of this litigation I have considered the interests of
25 the Aggrieved Employees above my own personal interests.

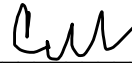
26 12. I respectfully request that the Court approve and award me a General Release Fee in
27 the amount of \$5,000.00 for my efforts and active participation in the case and for the broader, general
28 release of all claims that I have or may have against Defendant in connection with the settlement.

1 Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

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

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

5 Executed on 10/09/2024 at Aptos, California

6
7 

8 Corina Martinez