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12 Attorneys for Plaintiff
Nicole Torres and the Proposed Class
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14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF SAN FRANCISCO**

16 NICOLE TORRES, individually, and on
17 behalf of other members of the general
18 public similarly situated and on behalf of
19 other aggrieved employees pursuant to the
California Private Attorneys General Act;

20 Plaintiff,

21 v.

22 RAINBOW GROCERY COOPERATIVE,
INC., a California corporation; and DOES 1
23 through 100, inclusive,

24 Defendants.
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Case No.: CGC-24-612573

**DECLARATION OF PLAINTIFF NICOLE
TORRES IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Hearing Information:

Date: November 4, 2025
Time: 11:00 a.m.
Dept.: 304
Judge: Hon. Ethan P. Schulman

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1. I am over the age of 18 years old and a resident of the State of California. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would do so competently. I make this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement.

3. I was employed by Rainbow Grocery Cooperative, Inc. ("Rainbow") as an hourly-paid, non-exempt employee from approximately June 2023 through September 2023.

5. I understand that as a Class Representative I have an important duty to look out for the best interests of the Class. I understood from the start of considering this case based on my discussions with my lawyers that I would have to take on significant responsibilities and burdens for the benefit of the Class, which could include having my deposition taken to give testimony under oath, that I could face the possibility of subpoenas being issued to former and current employers, and that I may testify in Court for the benefit of not only myself but the other members of the Class. I have had numerous conversations with my attorneys regarding this case in order to provide them with the information and documents that they needed to handle the matter. I answered numerous questions that my attorneys had about the case, reviewed the complaint when it was filed, participated in discussions about mediation and resolution of the matter, and reviewed the settlement agreement.

6. I have taken my responsibility as a Class Representative seriously and will continue to do so. I have learned about the laws relating to the issues in this Action, including laws about minimum wages, overtime, meal breaks and rest breaks.

1 7. I know of no conflicts between my interests and goals and the interests and goals
2 of anyone else in the Class.

3 I declare under penalty of perjury under the laws of the United States and the State of
4 California that the foregoing is true and correct. Executed on October 10, 2025, in San Francisco
5 County, California.

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8 NICOLE TORRES
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