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13 Nicole Torres and the Proposed Class

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

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

Hearing Information:

Date: December 16, 2025
Time: 1:30 p.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 supplemental declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on December 8, 2025, in San Francisco County, California.

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