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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

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

Plaintiff,

vs.

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

Defendants.

Case No. CGC-24-612573

Honorable Ethan P. Schulman
Department 304

CLASS ACTION

DECLARATION OF RYAN SLINGER IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Date: November 4, 2025
Time: 11:00 a.m.
Department: 304

Complaint Filed: February 22, 2024
Trial Date: None Set

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DECLARATION OF RYAN SLINGER

I, Ryan Slinger, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Nicole Torres ("Plaintiff") in the above-captioned action (the "Action"). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and if called as a witness, I could and would competently testify thereto.

EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC

2. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wage, provision of meal and rest breaks and/or premium wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statues, under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

3. Edwin Aiwazian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served

as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade and litigated over 1,000 class action or representative action cases.

4. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and

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defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative action cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and has worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

5. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District Courts in California, U.S. Ninth Circuit Court of Appeals, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal, and obtained notable decisions regarding, Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class

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action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby Aiwazian's supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

6. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice before all courts of the State of California. I have worked on many wage-and-hour class action and PAGA representative cases, and my work on these cases has included preparing pleadings and motions, making court appearances, and drafting and finalizing settlement agreements.

WORK PERFORMED BY CLASS COUNSEL

7. Lawyers *for* Justice, PC has been actively engaged in this litigation from the inception of the Action, which was filed on February 22, 2024. Lawyers *for* Justice, PC has fully and actively participated in the litigation process throughout the pendency of the Action. Lawyers *for* Justice, PC joined forces with other plaintiff's counsel, Domb & Rauchwerger LLP, to represent Plaintiff (together, the firms are referred to as "Class Counsel"), and the Class Members.

8. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims, and worked on preparing the case for class certification and trial, prior to reaching a settlement in this action. This matter has involved extensive and ongoing investigations, research, and discovery into legal and factual issues. Class Counsel obtained information from Plaintiff, reviewed and analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources, researched applicable law, and undertook analyses and calculations of the value of claims, damages, and penalties exposure. Class Counsel also propounded formal, written discovery, and agreed with Defendant's counsel to engage in additional informal mediation discovery. Class Counsel met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, formal and informal discovery, and

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production of information, data, and documents in the course of litigation and mediation. Other work that Class Counsel performed included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings and motion-related papers; case management; claims assessment and evaluation; and preparing for and attending court proceedings, mediation, and settlement negotiations.

9. As outlined herein, the parties have conducted significant investigation and formal and informal discovery during the course of this litigation. Class Counsel analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. This information, documents, and data provided a critical understanding of the nature of the work performed by class members and aggrieved employees, class members' and aggrieved employees' timekeeping and payroll records, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, and penalties valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Accordingly, sufficient investigation and review of information has taken place in order for the parties to be adequately informed of the nature and extent of the claims, and to enable all parties to fully evaluate the settlement for its fairness, adequacy, and reasonableness.

10. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the parties engaged in mediation and extensive settlement negotiations to try to resolve the case. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position. In the course of the mediation and settlement negotiations, the parties discussed all aspects of the case, including the risks and delays of further litigation, class certification, and/or trial, the law relating to, *inter alia*, class certification, off-the-clock theory, meal and rest periods, PAGA representative claims, and wage-and-hour enforcement, as well as the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to all parties was not easy. After conducting extensive investigations, discovery, and settlement negotiations, and with the aid of the mediator's evaluations, the parties have agreed to resolve the case given the legal issues relating to Plaintiff's principal claims, as well

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as the costs and risks to both sides that would attend further litigation, and the real possibility of no recovery after years of litigation.

CLASS REPRESENTATIVE SERVICE PAYMENT

11. In exchange for her broader individual waiver and release of claims against the Released Parties with a California Civil Code Section 1542 waiver (set forth in Paragraph 5.3 of the Settlement Agreement), and also in recognition of her efforts and work spearheading the prosecution of the case and serving as the Class Representative, the Settlement provides for a Class Representative Service Payment in the amount of up to $7,500.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing her employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is fair and appropriate for Plaintiff to receive $7,500.00 as a reasonable Class Representative Service Payment, in addition to her individual settlement payment.

12. No one at Lawyers *for* Justice, PC has any financial interest in the Administrator, Phoenix Class Action Administration Solutions, which would create a conflict of interest.

13. No one at Lawyers *for* Justice, PC has any relationship, financial interest, or involvement in the governance of the designated cy pres recipient, La Raza Centro Legal, which would create a conflict of interest.

14. To my knowledge, there are no actual or potential conflicts of interests between Lawyers *for* Justice, PC and any of the Class Members which would interfere with our ability to fulfill our duties as Class Counsel or impede our representation of the Class.

15. I submit that the Agreement is fair, reasonable, and adequate, and is in the best interests of Plaintiffs, the Class Members, Aggrieved Employees, and the State of California.

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

Executed on this 13th day of October 2025, at Glendale, California.

Ryan Slinger

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