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Attorneys for Plaintiff PATRICIA ARELLANO
Individually and on behalf of all other Aggrieved Employees
[Additional Counsel on the Following Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

PATRICIA ARELLANO and MARIA
IBANEZ, individually and on behalf of
all other Aggrieved Employees,

Plaintiffs,
v.

NORTHGATE GONZALEZ MARKETS,
INC.; and DOES 1 to 100, inclusive,

Defendants.

Case No.: 24STCV10515

*[Assigned for all purposes to the Honorable
Rupert A. Byrdsong, Dept. 318]*

**DECLARATION OF PLAINTIFF
PATRICIA ARELLANO IN SUPPORT
OF PLAINTIFFS' MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

*[Filed concurrently with Notice of Motion and
Motion for Approval of PAGA Settlement;
Memorandum of Points and Authorities in
Support of Motion for Approval; Declaration
of Haig B. Kazandjian; Declaration of Sergio
Julian, Esq.; Declaration of James Clark;
Declaration of Maria Ibanez; and [Proposed]
Order]*

Status Conference
Date: August 31, 2026
Time: 8:30 a.m.
Dept.: 318

Action Filed: April 26, 2024
FAC Filed: May 14, 2026
Trial Date: None Set

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Attorneys for Plaintiff MARIA IBANEZ,
Individually and on behalf of all other Aggrieved Employees

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1 what documents to obtain from Defendant. I routinely checked in with my attorneys and their
2 staff to make sure that they had all of my most current information and any additional
3 information that I had obtained from speaking with other employees.

4 5. Throughout the case, I was available to answer any questions my attorneys had,
5 and I was available to speak and meet with my attorneys whenever they needed me. I
6 responded to them as quickly as possible and gave them as much information as I could. I
7 spent additional hours speaking with my attorneys about the case, identifying potential
8 witnesses, providing my attorneys with documents and information for the purposes of
9 discovery, and also describing documents, policies, practices, and procedures of Defendant.

10 6. As far as the settlement is concerned, I was available to review documents and
11 answer any questions my attorneys had. I spent extensive time assisting my attorneys to
12 prepare for private mediation in this matter and to review the documents and data Defendant
13 produced in connection to mediation. I spent additional hours reviewing the settlement
14 agreement, reviewing and discussing the contents of the Settlement Agreement with my
15 attorneys and asking questions and discussing the potential settlement with my attorneys
16 before signing the settlement agreements.

17 7. I believe that I have done everything that my attorneys have asked of me and
18 have tried, to the best of my ability, to represent the aggrieved employees. I understand and
19 willingly accept my fiduciary obligations to prosecute this case on behalf of the employees
20 that make up the absent aggrieved employees. I think my efforts helped to get the result
21 obtained in this case, and as a Representative Plaintiff, I respectfully request that the Court
22 award me a service award payment in the amount of Two Thousand Five-Hundred Dollars
23 and No Cents (\$2,500.00) for my active participation in this case. Taking into consideration
24 the time that I have dedicated to this case, I believe that this amount is reasonable.

25 8. I am not related to anyone associated with the Haig B. Kazandjian Lawyers,
26 APC, Blumenthal Nordrehaug Bhowmik De Blouw LLP, or Lavi & Ebrahamian, LLP. I am
27 aware and have agreed to the Joint Prosecution Agreement between Haig B. Kazandjian
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1 Lawyers, APC, Blumenthal Nordrehaug Bhowmik De Blouw LLP, or Lavi & Ebrahamian,
2 LLP. I am aware of the agreement to split the attorney fees in this action between the law firms
3 and consented to the fee split in writing. I am informed that the amount of attorney's fees will
4 not increase as a result of this fee sharing agreement.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed this 31st day of July, at Los Angeles, California.

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