Barbara DuVan-Clarke (State Bar No. 259268)
BDC@blackstonepc.com
Danielle L. GruppChang (State Bar No. 313881)
dgruppchang@blackstonepc.com
P.J. Van Ert (State Bar No. 234858)
pjvanert@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
James S. Winn Jr. (State Bar No. 349690)
jwinn@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff VANESSA BALTAZAR, 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 SAN BERNARDINO

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

Plaintiff,

vs.

SA FOOD SERVICE, LLC; and DOES 1 through 25, inclusive,

Defendant.

Case No.: CIVSB2421571

Honorable Michael A. Sachs
Department S28

DECLARATION OF PLAINTIFF VANESSA BALTAZAR IN SUPPORT OF MOTION FOR APPROVAL OF PAGA SETTLEMENT AND AWARD OF ATTORNEYS' FEES AND COSTS, ENHANCEMENT PAYMENT, AND SETTLEMENT ADMINISTRATION COSTS

Date:	March 23, 2027
Time:	8:30 a.m.
Dept:	S28
Complaint Filed:	July 1, 2024
Trial Date:	Not Set

DECLARATION OF VANESSA BALTAZAR

I, Vanessa Baltazar, 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-captioned case. 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 SA Food Service, LLC ("Defendant") as an hourly-paid, non-exempt General Manager from approximately May 2018 to approximately March 2024.

3. Because I thought the practices at Defendant may not be lawful, I decided to seek legal advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a PAGA representative. This process included searching for and providing documents concerning my employment with Defendant, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Defendant.

5. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained. I made myself available to answer any questions my attorneys had about Defendant practices and treatment of their employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.

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

7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also understood there was a risk of losing any job and/or income due to the time that I would have to spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In contrast, the other employees who will be receiving money from this lawsuit did not have to file a claim or take the risk that I took in bringing this action.

8. I reviewed the settlement agreement, discussed the settlement agreement with my attorneys, and asked them questions before signing it.

9. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the Aggrieved Employees and the State of California. I have spent approximately 30-35 hours participating in this case as described above. I believe my efforts helped get the result obtained in this case.

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

11. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of $7,500.00 for my efforts and active participation in the case. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

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

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 06/10/2026, at Hemet, California.



Vanessa Baltazar