

Jonathan M. Genish (State Bar No. 259031)
jgenish@blackstonepc.com
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
Annabel Blanchard (State Bar No. 258135)
ablanchard@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Blvd., Suite 745
Beverly Hills, California 90211
Telephone: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff, Triada Pallidou

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

TRIADA PALLIDOU, individually, and on
behalf of Aggrieved Employees pursuant to
the California Private Attorneys General Act;

Plaintiff,

vs.

TJB GEARYS, LLC dba GEARYS
BEVERLY HILLS, a Limited Liability
Company; and DOES 1 through 25, inclusive,

Defendants.

Case No. 24STCV15627
[related to Case No. 24STCV09753]

Honorable Timothy Patrick Dillon
Department 15

**DECLARATION OF TRIADA PALLIDOU
IN SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS, ENHANCEMENT PAYMENT, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: February 19, 2026
Time: 9:00 a.m.
Dept.: 15

Complaint Filed: June 21, 2024
Trial Date: None Set

DECLARATION OF TRIADA PALLIDOU

I, Triada Pallidou, declare and state as follows:

1. I am over the age of eighteen (18) and I am a resident of the State of California. 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 am the named plaintiff in this action.

3. I was employed by Defendant TJB Gearys, LLC d/b/a Gearys Beverly Hills (“Defendant”) as a Sales Associate from approximately October 2023 to December 2023. I was always an hourly-paid, non-exempt employee during my employment with Defendant.

4. During my employment, I questioned whether Defendant was paying its employees correctly and I believed that I and other employees were not being allowed to take meal and rest breaks lawfully, among other things. I decided to seek legal advice about my experience working for Defendant and to obtain information about filing a lawsuit to redress these grievances.

5. I contacted Blackstone Law, APC and spoke with attorneys there. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, not providing employees with lawful meal and rest breaks, not reimbursing employees for business expenses, and other related violations. After speaking with the attorneys, I educated myself on representative action lawsuits to gain a better understanding of them. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my experiences and what it meant to bring a lawsuit under the California Labor Code Private Attorneys General Act of 2004 (“PAGA”).

6. I have regularly communicated with my attorneys regarding the case and in order to fulfil my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with Defendant, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other hourly-paid, non-exempt employees, and helped determine what other documents and information they could obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my current information so that they could always reach me, and to provide any additional information that I had obtained.

1 7. I was always available to answer any questions my attorneys had and to speak and meet
2 with my attorneys whenever they needed me. I responded to them as quickly as possible and gave
3 them as much information as I could. I described Defendant's policies, practices, and procedures. I
4 also contacted and referred potential witnesses to my attorneys, and helped my attorneys prepare for
5 and participate in mediation.

6 8. I reviewed the settlement agreement and discussed it with my attorneys before I signed
7 it.

8 9. I also understood that if this matter had proceeded to trial, I would need to come to
9 court and participate in the trial. I was prepared to do that.

10 10. I am aware that I took a risk by filing this lawsuit because if we lost, I could potentially
11 have to pay the costs incurred in the lawsuit. I also risked losing income for the time that I would have
12 to spend fulfilling my ongoing responsibilities including having to attend the trial. In contrast, the
13 other employees who will be receiving money from this lawsuit did not have to file any claim or
14 lawsuit or take the risks that I took in bringing this action.

15 11. I believe that I have done everything that my attorneys have asked of me and tried, to
16 the best of my ability, to seek relief for the aggrieved employees, and the State of California. I think
17 my efforts helped to get the result obtained in this case.

18 12. I understand that any resolution of this lawsuit on a representative basis is subject to
19 court approval. I have, at all times throughout the course of this litigation, considered the interests of
20 the other aggrieved employees above my own personal interests.

21 13. To date, I estimate I have spent approximately 45 hours on this case. I have worked to
22 assist my attorneys in this matter for over a year, as the Defendant has actively fought this case.

23 14. I respectfully request that the Court approve and award me an enhancement payment
24 in the amount of \$7,500.00 for my efforts and active participation in the case. Taking into
25 consideration the time and effort that I have dedicated to this case, I believe that this amount is
26 reasonable.

27 15. I am not related to anyone associated with Blackstone Law, APC.
28

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

3 Executed on 11/14/2025 at Los Angeles, California

4 *Triada Pallidou*

5
6 Triada Pallidou