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8 *Attorneys for Plaintiffs Norma Santizo*
9 *and Mimi Lee, individually and on behalf*
10 *of all others similarly situated*

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 IN AND FOR THE COUNTY OF SAN MATEO

14 NORMA SANTIZO and MIMI LEE,
15 individually and on behalf of all others
similarly situated,

16 Plaintiffs,

17 vs.

18 NEAL'S COFFEE SHOP, INC., a California
19 corporation; SUNIL PRASAD, an individual,
and DOES 1 through 20, inclusive,

20 Defendants.

Case No. 24-CIV-03380
Assigned for All Purposes to
Honorable Nicole S. Healy, Dept. 28

**DECLARATION OF NORMA SANTIZO IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: August 13, 2025
Time: 2:00 p.m.
Place: Dept. 28
Judge: Honorable Nicole S. Healy

Complaint Filed: June 17, 2024
Trial Date: None Set

1 I, NORMA SANTIZO, declare as follows:

2 1. I am a named Plaintiff in this case. I have personal knowledge of the facts set
3 forth in this Declaration and could and would testify competently to them.

4 2. I submit this declaration in support of Plaintiffs' Unopposed Motion For
5 Preliminary Approval of Class Action Settlement.

6 3. I am currently employed by Neal's Coffee Shop and Sunil Prasad in California as
7 a Server.

8 4. I was hired by Neal's Coffee Shop in approximately 2001 and have worked in its
9 Burlingame and San Mateo locations as a Server; that is, in a class position.

10 **TIME SPENT ON LITIGATION**

11 5. Since the inception of this lawsuit, I have spent approximately 50 hours on this
12 case.

13 6. At the outset of the case, I spent approximately 15 hours being interviewed by
14 various counsel regarding the wage and hour violations and payment policies for Neal's Coffee
15 Shop employees and gathering supporting documents, including paystubs, paychecks, time
16 records, and schedules. I worked closely with the attorneys as they investigated the allegations
17 and drafted the Complaint, including providing them relevant documents in my possession. I
18 reviewed the draft Complaint before it was filed.

19 7. Thereafter, I communicated on a regular basis with my attorneys via phone, text
20 and e-mail which has taken about 12 hours of time.

21 8. Additionally, I met with colleagues to explain the case and locate relevant
22 documents in their possession, including paystubs, paychecks, contemporaneous time records,
23 and schedules. I also put the attorneys in touch with employees to be interviewed. As a result of
24 the litigation, Defendants attempted to implement new policies, including a meal and rest break
25 policy and a meal break waiver, which I discussed with counsel and explained to my colleagues.
26 I estimate I spent approximately 10 hours on these tasks.

27 9. I prepared for and attended the full-day mediation in this case and I made myself
28 available by phone to discuss settlement with Class Counsel in the weeks afterward as they

1 continued to engage in settlement discussions.

2 **RISKS ASSOCIATED WITH LITIGATION**

3 10. I understand that I have been exposed to potential risks by being a named Plaintiff
4 in this case while remaining an employee. I was aware that my name would be shared with
5 Neal's Coffee Shop (my current employer) and that my suing my employer would be matter of
6 public record. I continue to be employed at Neal's Coffee Shop, but have had concerns that my
7 participation in the litigation has impacted and might further impact that continued employment,
8 including reduction of my hours of work and work schedule. Additionally, both my spouse and I
9 work at Neal's Coffee Shop, so our entire household's income depends on our employment by
10 Defendants.

11 11. I also risked my future employment if a potential future employer discovered that
12 I had initiated a class action lawsuit against my former employer, Neal's Coffee Shop. I know
13 that it is common for prospective employers to search the internet for information regarding
14 prospective applicants. I am concerned that a potential future employer will discriminate,
15 retaliate, or perceive me negatively because of my involvement in this lawsuit.

16 12. If I were to lose my ability to work, it would place a significant hardship on my
17 ability to support myself financially.

18 13. I also understood that proceeding as a class action might involve a delay in the
19 resolution of my claim and in the payment of any amounts to me as opposed to proceeding with
20 my individual claim, but nevertheless I agreed to proceed with a class action so that other Neal's
21 Coffee Shop employees could also benefit.

22 14. Neither my attorneys, nor anyone else, ever promised me any amount of money to
23 serve as class representative, or in connection with my approval of this settlement.

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GENERAL RELEASE

15. As part of the proposed class action settlement, Neal's Coffee Shop and Sunil Prasad require that I execute a general release of claims. Settlement Class Members are only required to provide a release of claims that arise out of or are reasonably related to the factual allegations alleged in the Complaint.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21 day of July 2025, at Burlingame, California.



norma santizo (Jul 21, 2025 13:22 PDT)

NORMA SANTIZO