

1 JOHN T. MULLAN (SBN 221149)
jtm@rezlaw.com
2 MICHELLE G. LEE (SBN 266167)
mgl@rezlaw.com
3 JESSICA P. SPIERER (SBN 348093)
jps@rezlaw.com
4 RUDY, EXELROD, ZIEFF & LOWE, LLP
5 351 California Street, Suite 700
San Francisco, CA 94104
6 Telephone: (415) 434-9800
7 Facsimile: (415) 434-0513

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

21 **DECLARATION OF MIMI LEE IN**
22 **SUPPORT OF MOTION FOR**
23 **PRELIMINARY APPROVAL OF CLASS**
24 **ACTION SETTLEMENT**

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

25 Complaint Filed: June 17, 2024
26 Trial Date: None Set
27
28

1 I, MIMI LEE, 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 was hired by Neal's Coffee Shop in approximately 2001 and worked in its
7 Burlingame and San Mateo locations as a Server—that is, in a class position—through April
8 2024. I am no longer employed by Neal's Coffee Shop.

9 **TIME SPENT ON LITIGATION**

10 4. Since the inception of this lawsuit, I have spent approximately 25 hours on this
11 case.

12 5. At the outset of the case, I spent approximately 3 hours being interviewed by
13 various counsel regarding the payment policies for Neal's Coffee Shop employees. I worked
14 closely with the attorneys as they investigated the allegations and drafted the Complaint,
15 including providing them relevant documents in my possession. I reviewed the draft Complaint
16 before it was filed.

17 6. Thereafter, I communicated on a regular basis with my attorneys via phone, text
18 and e-mail, which has taken about 5 hours of time.

19 7. During the informal discovery phase of this litigation, I searched for and provided
20 documents responsive to my counsel's requests that would support the claims. I estimate I spent
21 approximately 2 hours on these tasks.

22 8. With my counsel, I prepared for the mediation in this case. I attended the full-day
23 mediation and I made myself available by phone to discuss settlement with Class Counsel in the
24 weeks afterward as they continued to engage in settlement discussions.

25 **RISKS ASSOCIATED WITH LITIGATION**

26 9. I understand that I have been exposed to potential risks by being a named Plaintiff
27 in this case. I was aware that my name would be shared with Neal's Coffee Shop (my former
28 employer) and that my suing my former employer would be matter of public record.

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

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

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

GENERAL RELEASE

13. 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 under the laws of the State of California that the foregoing is true and correct. Executed this 21 day of July 2025.

Mimi Lee

Mimi Lee (Jul 21, 2025 17:42 PDT)

MIMI LEE