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Attorneys for JulieAnne Sacueza Cabrera,
individually and on behalf of all others similarly situated

IN THE SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

JULIEANNE SACUEZA CABRERA, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

TRINITY MA INC. D.B.A. HAPPY LEAF
COLLECTIVE; and DOES 1 through 100,

Defendants.

Case No. 25STCV02111

**DECLARATION OF JULIEANNE
CABRERA IN SUPPORT OF APPROVAL
OF PAGA SETTLEMENT**

I, JulieAnne Secueza Cabrera, declare as follows:

1. I am over the age of 18 years, and the named plaintiff in the above captioned case. I have personal knowledge of the facts attested to herein, and if called upon to testify I could and would competently testify thereto.

2. I worked for Defendants from approximately September 2021 to October 7, 2024, as a bud tender.

3. During the course of my employment, I was frequently denied full and complete meal and rest breaks. Specifically, I was frequently interrupted to handle issues with customers or other work related tasks while I was supposedly on break. This happened with such frequency and regularity that I was effectively “on call” even on rest and meal breaks. Break time was never permitted to be made up when it was interrupted.

4. The time spent working while on one of these meal breaks was not compensated as time worked because the tasks were performed while still clocked out for meals.

5. Since the time spent working through my meal breaks was not correctly logged, my wage statements also did not correctly list the number of hours worked.

6. My employment with Defendants was terminated on or about October 7, 2024. At that time, I am informed and believe that Defendants were aware that they had not paid my all wages due for all hours worked, because management were the ones directing me to come back from meals to perform the tasks.

7. In addition to the wage and hour claims above, my complaint alleged retaliation and wrongful termination. Those claims were settled via a separate, confidential settlement agreement. In my complaint, I claimed lost wages. While employed by Defendants, I worked 8 hours per day (in addition to the unpaid meal break time worked), 5 days per week, at a rate of \$18.50 per hour, or approximately \$38,480 per year.

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

Executed on 11/18/2025 in Los Angeles, California

Signed by:

Julianne Sacuza Cabrera

JulieAnne Cabrera