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County of Santa Clara,  
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Case #20CV375150  
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **FOR THE COUNTY OF SANTA CLARA**

11 JACOB BLEA, individually, and on behalf of  
12 aggrieved employees pursuant to the Private  
13 Attorneys General Act (“PAGA”);

14 **Plaintiff,**

15 v.

16 PACIFIC GROSERVICE INC., a California  
17 corporation; PITTSBURG WHOLESALE  
18 GROCERS, INC. d/b/a PITCO FOODS, a  
19 California corporation; and DOES 1 through  
20 100, inclusive;

21 **Defendants.**

Case No.: 20CV375150

Assigned for All Purposes to:  
Honorable Sunil R. Kulkarni  
Department 1

**CLASS ACTION**

**SUPPLEMENTAL DECLARATION OF  
VERONICA OLIVARES REGARDING  
NOTICE AND SETTLEMENT  
ADMINISTRATION**

[Amended [Proposed] Order of Final Approval  
and Judgment filed concurrently herewith]

Hearing Date: June 8, 2023  
Hearing Time: 1:30 p.m.  
Hearing Place: Department 1

Complaint Filed: December 28, 2020  
FAC Filed: May 11, 2022  
Trial Date: None Set

1 **SUPPLEMENTAL DECLARATION OF VERONICA OLIVARES**

2 I, **VERONICA OLIVARES**, declare the following facts to be true and correct and if called  
3 as a witness would testify competently to the same:

4 1. I am employed as a Case Manager by CPT Group, Inc. (“CPT Group”), Court-  
5 approved class action Settlement Administrator for *Blea v. Pacific Groservice, Inc. et al.* I have  
6 personal knowledge of the facts set forth in this Declaration, and if called as a witness, I could and  
7 would testify competently thereto.

8 2. I submit this supplemental declaration to update my prior declaration that is dated  
9 April 28, 2023.

10 **UNDELIVERABLE NOTICE PACKETS**

11 3. On March 23, 2023, CPT Group mailed Notice Packets to one thousand one hundred  
12 thirty-six (1,136) Class Members via first-class regular U.S. Mail. The Notice Packets informed  
13 Class Members the Response Deadline was May 22, 2023.

14 4. As of the date of this signed declaration, eighty-three (83) Notice Packets were  
15 returned by the Post Office, seven (7) of which was provided a new address by the Post Office. For  
16 the remaining seventy-six (76) Notice Packets, CPT Group performed a skip trace to locate a better  
17 address using Accurint, one of the most comprehensive address databases available. Accurint  
18 utilizes hundreds of different databases supplied by credit supporting agencies, public records, and a  
19 variety of other national databases.

20 5. As a result of skip trace effort or remail request from counsel or the Class Member  
21 themselves, a total of sixty-six (66) Notice Packets have been remailed to date. In addition, three (3)  
22 Notice Packets were also forwarded by CPT Group. As of the date of this declaration, a total of  
23 nineteen (19) Notice Packets are deemed undeliverable as no better addresses were provided from  
24 the Post Office or obtained through skip trace.

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1 **REQUEST FOR EXCLUSIONS, OBJECTIONS, AND DISPUTES**

2 6. As of the date of this signed declaration, CPT Group has only received one (1)  
3 written dispute from a Class Member regarding the weeks worked. This inquiry was forwarded to  
4 Defendant’s counsel for review and was approved in favor of the Class Member. Thus, there are  
5 currently no outstanding disputes.

6 7. As of the date of this signed declaration, CPT Group has not received any objections  
7 from Class Members.

8 8. As of the date of this signed declaration, CPT Group has received five (5) requests for  
9 exclusion from Class Members. The Class Members who requested exclusion are Jorge Aguilar,  
10 Haile Afeworki Bahlbi, Jared Israel Gomez, Miguel Villasenor, and Jose Cazares.

11 9. As of the date of this signed declaration, CPT Group has received one (1) duplicate  
12 response that has been invalidated.

13 **BREAKDOWN OF NET SETTLEMENT AMOUNT**

14 10. As of the date of this signed declaration, there are one thousand one hundred thirty-  
15 one (1,131) Participating Class Members entitled to a portion of the Net Settlement Amount, which  
16 represents a participation rate of approximately ninety-nine percent (99.56%). Furthermore, nine  
17 hundred thirty-nine (939) of the Class Members are also Eligible Aggrieved Employees who will  
18 receive a portion of the PAGA Payment (\$25,000).

19 11. Pursuant to the Settlement Agreement, the entire Net Settlement Amount was used to  
20 calculate the Individual Settlement Share for each Participating Class Member. The Net Settlement  
21 Amount was calculated as set forth below:

22	<b>Gross Settlement Amount</b>	<b>\$2,500,000.00</b>
23	Less Attorney Fee Award (Requested)	-\$833,333.33
24	Less Cost Award (Requested)	-\$15,467.55
25	Less Class Representative Enhancement Payment (Requested)	-\$10,000.00
26	Less Administration Costs	-\$18,000.00
27	<u>Less PAGA Payment</u>	<u>-\$100,000.00</u>
28	<b>Net Settlement Amount</b>	<b>\$1,523,199.12</b>

