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8 Attorney for Plaintiff VANESSA BUSTOS, REZELLE
BUSTOS and all others similarly situated

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 IN AND FOR THE COUNTY OF SAN FRANCISCO
11 UNLIMITED JURISDICTION

12 VANESSA BUSTOS and all others similarly
13 situated,

14 Plaintiff,

15 -vs-

16 COFFEE MEETS BAGEL, INC.; ARUM
KANG; DAWOON KANG and DOES 1-60
17 inclusive,

18 Defendants.

Case No. CGC-19-575734

DECLARATION OF VANESSA
BUSTOS IN SUPPORT OF MOTION
FOR FEES AND SERVICE AWARD.

Date: July 14, 2022
Time: 2:00 p.m.
Dept 613
Hon. Andrew Cheng

19 I, VANESSA BUSTOS, declare and state as follows:

20 1. I am one of the plaintiffs in this action and I make this declaration in support of the
21 motion for attorney's fees and service payment.

22 2. I worked for Coffee Meets Bagel ("CMB") between January 2017 and January 24,
23 2019. I was always treated by the company as an independent contractor and in that role I was
24 compensated as a contractor and excluded from the protections afforded to employees by
25 California law. In fact, I was terminated for complaining about not being paid my overtime.

26 3. I engaged the service of my attorney, Carlos Jato, to help me, and my sister pursue
27 claims against the company for failing to compensate me, my sister and the other CMB's
28


1 employees in compliance with the law. I did not keep track of all the hours I consulted with my
2 lawyer or the time I worked in the case assisting my lawyers but I would estimate at least two
3 dozen hours. I oversaw the drafting of the complaint and the PAGA letter that we sent to the State
4 of California. I also provided my lawyer with a detailed ledger of the hours I worked for the
5 company as a contractor which was an important piece used by my attorneys to be able to
6 estimate the damages of the class members.

7 4. I recall working to respond to well over fifty written questions (over several sets of
8 interrogatories) and being asked to locate and produce many documents in response requests for
9 productions of documents. Most of the questions pertained not to my claims but to the work of
10 my fellow co-workers who were treated the same way I was treated by the company. I also
11 assisted my lawyer prepare in preparation the deposition of defendant's witness, Mr. Miller.
12 These tasks easily took at least 5 hours of my time.

13 5. In addition, I actively participated at two mediations which lasted two full days. I
14 did all this to keep CMB accountable and if I had used this time for my own work I would have
15 probably earned more than \$2,500.00.

16 6. I also took considerable risk. For instance, CMB knew where I was working after I
17 left CMB and I risked them contacting my subsequent employers to influence them to terminate
18 my employer. I also accepted the risk that future prospective employers might learn that I sued,
19 CMB, my employer, and I might not get hired. Of course, I also took the risk that if the case was
20 unsuccessful, all my time and efforts would be for nothing and I could only CMB'S court costs
21 which would have been considerable.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct. Executed in Vallejo, California on May 31, 2022.

24 
25 Vanessa Bustos (May 30, 2022 16:18 PDT)
26 VANESSA BUSTOS