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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF PLACER

AYEBAINATON EKINE, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

BURBERRY LIMITED, a New York
corporation; and DOES 1 through 100,

Defendants.

CASE NO. S-CV-0045602

**DECLARATION OF EDWARD
CASTILLO IN SUPPORT OF
APPROVAL OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT, REASONABLE
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT AWARDS**

Date: October 28, 2021
Time: 8:30 a.m.
Dept.: 42

Action Filed: September 23, 2020
Trial Date: None Set

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I, EDWARD CASTILLO, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter against defendant Burberry Limited (“Defendant”). This declaration is submitted in support of approval of the Settlement Agreement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant as a Sales Associate from approximately November 24, 2018 to May 9, 2019.

3. During my employment with Defendant, Defendant required me to respond to her demands at all times. As a result, I was often not able to take a full 30-minute meal before the end of my fifth hour. Also, even when I did take the meal period on time, it was constantly interrupted and/or cut short because I had to respond to customers on my cell phone. This is true regarding my rest periods. Often times I had to respond to customers via text, call, or e-mail during times when I was not scheduled to work. Because of all of this, I believe Defendant did not pay me for all of my hours worked. I also believe that Defendant did not reimburse me for use of my personal cell phone. Although Defendant expected me to use my cell phone to communicate with its customers, Defendant did not reimburse me for having to use my cell phone, which customers continued to call even after Defendant gave me a company cell phone. Also, I learned that the wage statements which Defendant gave to me were not accurate because the Defendant did not include all of the hours and rates of pay owed under the "OT ON CALL" code.

4. I brought this lawsuit because I wanted Defendant to comply with the law and treat employees fairly. I feel that I have taken on a greater burden than any of the other class members because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. Although I was fearful of retaliation, I wanted to move forward with the lawsuit anyway. Through my efforts, Defendant has agreed to a settlement that will benefit Plaintiff's current and former employees, and I believe that I should be compensated for taking on the burden of this litigation to the benefit of the other employees.

5. I have been actively involved in this case at least since March 2020. Among other things, I gathered relevant documents for use in the lawsuit and provided factual information to my attorneys, had discussions with my attorneys regarding the claims in the lawsuit and Defendant's practices, and helped identify other employees who also experienced the same issues that I did while working for Defendant. I estimate that I have spent at least 15 hours in total on these activities.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on October 5, 2021 at Los Angeles, California.


Edward Castillo (Oct 5, 2021 08:07 PDT)

Edward Castillo