

Carolyn H. Cottrell (SBN 166977)
Esther L. Bylsma (SBN 264208)
SCHNEIDER WALLACE
COTTRELL KIM LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608
Tel: (415) 421-7100
Fax: (415) 421-7105
ccottrell@schneiderwallace.com
ebylsma@schneiderwallace.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

JASON KINGSLEY, individually, and on
behalf of other members of the general public
similarly situated,
Plaintiff,

vs.

IKEA US RETAIL LLC, a Virginia Limited
Liability Company; IKEA US WEST, an
unknown business entity; IKEA NORTH
AMERICA SERVICES, LLC, an unknown
business entity; IKEA DISTRIBUTION
SERVICES INC.; an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No. 24CV089765

CLASS ACTION

**DECLARATION OF RHONDA
GUERRERO IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Judge: Hon. Michael Markman
Dept: 23
Date: August 14, 2025
Time: 10:00 a.m.

Complaint Filed: August 30, 2024
Trial Date: None

1 I, Rhonda Guerrero, declare as follows:

2 1. I am a named plaintiff in the related actions *Wilson, et al. v. IKEA North America*
3 *Services, LLC, et al.*, Los Angeles Superior Court Case 20STCV32154 (“*Wilson Class Action*”)
4 and *Wilson, et al. v. IKEA North America Services, LLC, et al.*, Los Angeles Superior Court Case
5 20BBCV00789 (“*Wilson PAGA Action*,” together with the *Wilson Class Action*, the “*Wilson*
6 *Actions*”). I am over the age of 18. The following statements are based on my personal
7 knowledge. If called upon to testify as to the matters stated herein, I could and would do so
8 competently.
9

10 2. I submit this Declaration in Support of Plaintiff’s Motion for Final Approval of
11 Class Action Settlement (“*Motion*”) filed in the above-captioned action (“*Action*”). I understand
12 that this Action was filed pursuant to a global settlement involving the *Wilson Actions*, and that
13 Plaintiff’s Motion seeks the Court’s final approval of the global settlement involving the *Wilson*
14 *Actions*.
15

16 3. I was employed by Ikea North America Services, LLC, Ikea US Retail LLC, and
17 Ikea Distribution Services Inc. (“*Defendants*” or “*Ikea*”) as a non-exempt employee from
18 November 27, 2018 to November 2019, at Ikea’s retail location in Burbank, California.
19

20 4. I experienced issues in my employment with Ikea, including Ikea requiring me to
21 wait in lines before clocking in and out but not paying for that time as time worked. Schneider
22 Wallace Cottrell Konecky LLP and Lawyers for Justice PC were representing me in the *Wilson*
23 *Actions*, and James Hawkins APLC is now my additional counsel representing me in this Action,
24 which includes the claims in the *Wilson Actions*.
25

26 5. Prior to filing the complaints in the *Wilson Actions*, I had multiple telephone
27 conversations with my attorneys about my work experiences and possible claims.
28

29 6. I knew there was no guarantee we would be successful in the case and that there
30 was a significant chance of protracted litigation. I also understood that I could have to spend a
31 significant amount of my own time without any compensation in the discovery and litigation
process.

1 7. Additionally, I knew that my name would be on the action, and that this
2 information could be visible to others, potentially having a negative impact on my future
3 employment. I have continuing concerns that employers are looking unfavorably on my
4 involvement in a lawsuit against my employers and believe that at least on one occasion, I was
5 not hired because the potential employer knew about this case.
6

7 8. Still, I decided to file this lawsuit and serve as class representative because I
8 thought it was wrong what Ikea was doing and I wanted potentially to help all the other workers
9 who were also not getting paid for all their time, like me.

10 9. I worked with my attorneys to review facts and answer questions so they could
11 draft the complaint. The initial complaint in the *Wilson* Actions was filed on August 24, 2020.
12

13 10. Since August 24, 2020, I engaged in substantial efforts to pursue the Class and
14 PAGA claims in the *Wilson* Actions and this Action. For example, I worked with my attorneys to
15 provide approximately *twelve* sets of responses to discovery requests.

16 11. In addition, in advance of the June 28, 2022 joint mediation of the *Wilson* Actions,
17 I assisted my attorneys in preparing for the mediation. I had numerous meetings with my attorneys
18 to answer questions about my work experience and everything I could recall about the working
19 at Ikea. I remained on-call during the entire day of mediation, answered calls from my attorneys
20 during the mediation, and stayed updated regarding the process.
21

22 12. In addition, after we reached the previous settlement of the *Wilson* Actions, and
23 the current proposed global Settlement, I carefully reviewed the terms and discussed it numerous
24 times with my attorneys.

25 13. Throughout the *Wilson* Actions and the Action, I have been in constant
26 communication with my attorneys to keep apprised of the status of the litigation and answer
27 questions as needed. I have kept up to date on the status at every phase. I have and continue to
28 regularly contact my attorneys to check that the litigation is proceeding and check whether there
29 is anything I can do to help.
30
31

1 14. In sum, I worked with my attorneys to prepare the complaints, provided documents
2 and/or information regarding my experience working for Defendants, stayed up to date on the
3 case, the mediation process and settlement discussions, and otherwise remained in constant
4 contact with my attorneys. Over the course of this litigation, I have contributed numerous hours
5 of my own time to the litigation of these claims. Over the period of almost five years, I estimate
6 that I have spent and devoted at least 40 hours to this litigation.
7

8 15. To make this proposed Settlement a reality, I agreed to a general release. The
9 general release encompasses all individual claims I may have arising out of my employment with
10 Defendants. In contrast, I understand that the release for Class members is limited to the claims
11 alleged in this case. I agreed to the general release as a condition of Settlement so that the Class
12 members could benefit from the Settlement.
13

14 16. Aside from payment I am eligible to receive as a Class Member and Aggrieved
15 Employee, and the Incentive Award of \$10,000.00 for serving as Class Representative (subject
16 to Court-approval), I am not receiving any other benefits from this Settlement.
17

18 17. I understand that none of the 8000 plus Class members have objected to this
19 Settlement or the requested Incentive Award.
20

21 18. It has been almost five years that I have been committed to this case and as
22 discussed above, I have devoted significant time and efforts for the Class in this litigation. For
23 these reasons, I respectfully request the Court to grant my \$10,000.00 Incentive Award.
24

25 I declare under penalty of perjury under the laws of the State of California that the
26 foregoing is true and correct. Executed on 07 / 20 / 2025 at
27 Altadena, California.
28

29
30
31

Rhonda Guerrero