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

MARGARET MATTHEWS, OKEEM SMITH,
TOMAS VERDUZCO ALCALA, and DARRYL
KNOX, as individuals and on behalf of all others
similarly situated, and as private attorneys general,

Plaintiffs,

vs.

UNITED NATURAL FOODS WEST, INC., a
California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. S-CV-0046420

**DECLARATION OF MARGARET
MATTHEWS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: December 1, 2022
Time: 8:25 a.m.
Department: 3

Complaint Filed: March 23, 2021

1 I, Margaret Matthews, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. In October of 2019 I began working for United Natural Foods West, Inc. I was paid on an
7 hourly basis as a non-exempt employee and also earned wellness credits and quarterly bonuses. I
8 regularly was not provided either duty-free 10-minute rest periods or duty-free 30-minute meal periods
9 within the first five hours of work. Nor was I paid an additional hour of regular rate wages for the
10 missed meal and rest periods. I also am informed and believe that I was underpaid overtime wages and
11 sick pay wages, which were not paid based on my regular rate of pay. I also regularly worked from
12 home and incurred costs for internet service to perform work duties. I, however, was not reimbursed for
13 the expenses. I also am informed and believe that I was not provided with accurate itemized wage
14 statements.

15 3. I have taken all necessary steps to represent the interests of the Class, including by
16 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
17 and answering any questions that have come up, including about how I was paid or what my wage
18 statements show. I understand that I am responsible to the Class with respect to trying the case,
19 appearing in court, and working with Class Counsel. I am willing to act as a fiduciary for the Class. I
20 remain willing to devote my time to this lawsuit for the benefit of the Class. I do not believe I have any
21 interests that are adverse to the interests of the Class. I also am unaware of any such issues having been
22 raised or presented by anyone else.

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7 Margaret Josephine Matthews
8 1C6E725344BD4F8... Margaret Matthews

Margaret Josephine Matthews

...Margaret Matthews