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Attorneys for Defendant  
DECKERS OUTDOOR CORPORATION

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

JOE GUZMAN, individually, on a  
representative basis, and on behalf of all others  
similarly situated,

Plaintiff,

vs.

DECKERS OUTDOOR CORPORATION, a  
Delaware Corporation, and DOES 1 through 20,  
inclusive,

Defendant.

CASE NO. CVRI2100707

Honorable Craig G. Riemer

**DECLARATION OF COUNSEL FOR  
DECKERS OUTDOOR  
CORPORATION IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

DATE: May 9, 2022

TIME: 8:30 a.m.

Dept.: 1

First Amended

Complaint Filed:

May 21, 2021

Complaint Filed:

February 10, 2021

Discovery Cutoff:

Per Code

Motion Cutoff:

Per Code

Trial Date:

Not Set



1 of employment. However, the *Foster* Case did not subsume Plaintiff's claims for wage  
2 statement violations, failure to pay vested vacation at the proper rate under Labor Code §  
3 227.3, and failure to pay mandated sick pay at the proper rate under Labor Code § 246.

4 6. The parties stipulated to amend the operative complaint to eliminate the claims  
5 in the *Guzman* Case that were subsumed by the *Foster* Case settlement. The Court signed an  
6 Order approving that stipulation on March 29, 2022 granting Plaintiff leave to file their Second  
7 Amended Complaint which removed the claims that were settled in the *Foster* Case.  
8 Consequently, while some class members are the same in the *Guzman* Case and the *Foster*  
9 Case, the claims asserted in those cases do not overlap.

10 7. The attorneys in both the *Guzman* Case and the *Foster* Case are aware of both  
11 matters and the fact that both matters have settled and are undertaking the court approval  
12 process. I have had both email and phone communications with opposing counsel in the  
13 *Guzman* Case regarding the *Foster* Case and vice versa.

14 8. I have spoken with a representative of Deckers Outdoor Corporation and other  
15 attorneys in my firm to determine whether any other actions exist which may assert similar  
16 claims to those in the *Guzman* Case on behalf of a class of individuals who would also be  
17 members of the class as defined in the parties settlement in the *Guzman* Case. Aside from the  
18 *Foster* Case, no such similar cases exist.

19 I declare under penalty of perjury under the laws of the State of California that the  
20 foregoing is true and correct.

21 Executed this 12th day of April, 2022, at Santa Barbara, California.

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Jeffrey A. Dinkin