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Attorneys for Plaintiff Stephanie Paola Martinez and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

STEPHANIE PAOLA MARTINEZ,
ESTEBAN CASTRO, ADRIAN GUIZAR,
CAROLYNN BURKS AND MARIA Y.
SANTILLANO, on behalf of all others
similarly situated;

Plaintiffs,

vs.

BURLINGTON DISTRIBUTION CORP., a
Delaware Corporation; and DOES 1 through
20, inclusive;

Defendants.

AND THE CONSOLIDATED/RELATED
ACTIONS.

Case No.: CIVSB2129538
*[Assigned to Hon. Christian Towns, Dept. S26,
for all purposes]*

**DECLARATION OF STEPHANIE PAOLA
MARTINEZ IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing

Date: April 24, 2025
Time: 8:30 a.m.
Dept.: S26

Complaint filed: December 3, 2021

DECLARATION OF STEPHANIE PAOLA MARTINEZ

I, Stephanie Paola Martinez, state and declare:

1. I am one of the Plaintiffs in the above-captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. When I first retained my attorneys (Lauby, Mankin & Lauby and Bokhour Law Group, P.C.) and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my own personal interests, (3) participating actively in the lawsuit, including potential testimony at deposition and trial, and keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval and must be designed in the best interests of the class as a whole.

3. Since initiating this action on behalf of the proposed class, I believe I have more than adequately performed my duties as a class representative. I have been an active participant in this litigation, including assisting my attorneys in various ways and making myself available when needed. For example, I have assisted my attorneys by compiling and analyzing substantial documentation regarding the claims in this case. I have also helped to explain and discuss the company's practices and their general practices and procedures, as well as locate and analyze company documents, among others. I have also reviewed all settlement documents and believe that this settlement is fair for the class. Finally, I will continue taking all necessary steps to finalize this settlement and obtain court approval.

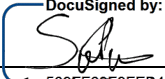
4. Additionally, I believe that my claims are typical of the other Burlington Distribution Corp. employees (the class members) because we were all subjected to the same uniform practices of the company in regard to failure to pay minimum and overtime wages, failure to provide meal and rest breaks, failure to pay meal, rest or recovery period premium

1 pay, failure to reimburse business related expenses, failure to pay vested vacation, failure to
2 timely pay all wages, failure to timely pay final wages, failure to provide accurate itemized
3 wage statements, violation of paid sick leave, failure to provide suitable seating, failure to
4 implement temperature control, Violation of Labor Code Sections 2100—2112 for Warehouse
5 Distribution Centers, Violation of Labor Code Sections 226, 432, 1198.5 and 2104 for Records
6 Requests, failure to maintain adequate records, unfair unlawful competition, and PAGA
7 penalties, along with other issues. For example, I was paid a base hourly rate with additional
8 compensation during employment, and I believe that the company utilized an identical class-
9 wide policy regarding how to calculate overtime and other pay on such occasions. Also, I was
10 required to incur various expenses to perform my duties for the company, yet I was not
11 reimbursed for those expenses, and other employees were subjected to the same practice.

12 5. I have no conflicts with the proposed class members and will continue to assist
13 with the litigation and prosecute the case on behalf of the other employees.

14 6. I respectfully request that the court preliminarily approve the service award. As
15 outlined above, I have performed substantial services for the Class and helped obtain a highly
16 beneficial settlement for my fellow employees. At the final approval stage, I will submit an
17 additional declaration setting forth all the work I did for this case, including an estimated
18 number of hours spent assisting the Class and my attorneys.

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20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct. Executed on 3/12/2025, at Yucaipa, California.

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24 Stephanie Paola Martinez
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