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Attorneys for Plaintiff
Wendy Navarro Garcia

IN THE SUPERIOR COURT OF CALIFORNIA

COUNTY OF ORANGE

WENDY NAVARRO GARCIA, individually
and on behalf of all others similarly situated,

Plaintiff(s),

v.

WIDDICOMBE ENTERPRISES, INC.; and
DOES 1 through 100,

Defendant(s).

Case No. 30-2021-01235358-CU-OE-CXC

**DECLARATION OF WENDY NAVARRO
GARCIA IN SUPPORT OF MOTION
FOR FINAL APPROVAL**

Date: January 5, 2024

Time: 1:30 p.m.

Dept: CX103

I, Wendy Navarro Garcia, declare the following:

1. I am the named plaintiff in the above captioned matter. I have personal knowledge of the facts set forth below, and if called to testify I could and would do so competently.
2. I was employed by Widdicombe Enterprises, Inc. as a nonexempt cashier from November 2019 to August 2021
3. During my employment, in my experience there was understaffing. As a result of being short-staffed, I frequently had to continue working through meal periods and rest breaks. Even if I did get meal or rest breaks, they were often interrupted. As such, my meal and rest breaks were frequently interrupted by work-related matters. I was specifically instructed to always make sure not

1 to punch back in before the end of 30 minutes on meal breaks, even if I did not actually could not
2 take an uninterrupted 30-minute meal period.

3 4. I understand that this action was brought on behalf of all other non-exempt employees of
4 Defendant, and thus I am acting as a representative for the class. As class representative, I
5 understood that it was my responsibility to act in the Class's best interests. There are no conflicts
6 which exist between me and the interests of the Class Members that would impair my ability to
7 serve as representative of the Class.

8 5. I have been willing to assist in the investigation of this matter, and I have made myself
9 available for any proceeding, including mediation, move the case forward.

10 6. Throughout this action, I regularly conferred with my attorneys to discuss the status of the
11 case, offered input, and assisted my attorneys in gathering facts and evidence to support the claims.

12 7. I understood that by filing this case I have made my name a matter of public record, such
13 that a current or future employer could find out that I filed this case

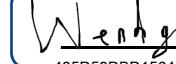
14 8. I understand that with the settlement agreement I have released all claims against Defendant.

15 9. Above all, I respectfully request the court to grant the motion for final approval.

16
17 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
18 and correct.

19 Date: December 12, 2023

DocuSigned by:



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Wendy Navarro Garcia