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Attorneys for Plaintiff Angelica Romero

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

MARIANO GAGLIARDI, individually and on
behalf of all similarly situated and aggrieved
employees,

Plaintiff,

v.

RALPH LAUREN RETAIL, INC., a Delaware
Corporation doing business in California, and
DOES 1 to 100,

Defendants.

Case No. CVRI2103581

**DECLARATION OF ANGELICA
ROMERO IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

Date: November 20, 2024

Time: 8:30 a.m.

Dept.: 1

Reservation ID: Per July 12, 2024 Order

AND CONSOLIDATED ACTION.

DECLARATION OF ANGELICA ROMERO

I, Angelica Romero, hereby declare and state as follows:

1. I am an individual over the age of 18 years and am a named Plaintiff in the above-captioned matter. I have personal knowledge of the facts contained in this declaration, and if called as a witness, could and would testify as to its accuracy.

2. I was employed by Defendant Ralph Lauren Retail, Inc. ("Defendant") as a Sales Associate from about April 12, 2012, until about November 2021. I worked as an hourly, non-exempt employee at Defendant's retail store location in Cabazon, California.

3. During my employment, I was regularly required to undergo security checks after clocking out of my shift. I was not paid for the time spent at work undergoing these security checks. As a result, I believe I was not paid all minimum and overtime wages owed, not provided proper meal and rest periods, not paid all wages owed upon separation of employment, and not provided with accurate wage statements due to the underpayment of wages.

4. During the course of this litigation, I have always made myself available to answer questions, gather and provide documents, review and execute the Settlement Agreement and this declaration. I will continue to make myself available to review any other documents needed to bring this matter to conclusion. I estimate that I have spent between 30-35 hours in pursuing this action.

5. I understand that this action was brought on behalf of other similarly situated employees of Defendant in the State of California, and thus I am acting as a representative for the Class. As a class representative, I understand that it is my responsibility to act in the Class's best interest and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

6. I have discussed the terms of the settlement with my attorneys, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Class.

7. I understand that the filing of this action was a matter of public record and that this

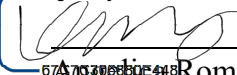
1 was being prosecuted on a class basis. I understand that a class action would take longer in
 2 litigation than an individual action and undertook such risks. I have not incurred any expenses but
 3 have spent a significant amount of time on this matter. Another risk I faced was whether the fact
 4 that I filed a case against my former employer could impact me in finding a job down the road.

5 8. As part of the Settlement Agreement, I understand that I will be providing a general
 6 release of my own individual claims, something that the other Class Members did not have to do. I
 7 understand that in addition to the enhancement that my lawyers have requested that the Court
 8 award to me for my efforts in assisting with the prosecution of this case, I am expected to receive
 9 approximately \$392.83, consisting of \$382.66 for the class amount and \$10.17 for the PAGA
 10 amount.

11 9. I have approved my attorneys to split the attorneys' fees as follows: 32.5% to
 12 Diversity Law Group; 17.5% to Polaris Law Group; and 50% to Frontier Law Center, which I have
 13 previously authorized in writing.

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

16 Executed on this 23rd day of October 2024, at Los Angeles, California.

17 Signed by:
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 19 Angelica Romero
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