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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IGNACIO MACIEL, RUTH TORRES, on
behalf of themselves and all other similarly
situated persons,

Plaintiffs,

vs.

M.A.C. COSMETICS INC., a New York
corporation; and DOES 1-50, inclusive,

Defendants.

CASE NO. 3:23-cv-03718-AMO

[Assigned to Hon. Judge Araceli Martinez-
Olguin]

**DECLARATION OF RUTH TORRES IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: January 15, 2026

Time: 2:00 p.m.

Ctrm: 10

1 I, RUTH TORRES, hereby state and declare as follows:

2 1. I am Ruth Torres and I am a Plaintiff in this case. I am fully familiar with the facts,
3 pleadings and history of this matter. The following facts are within my own personal knowledge, and if
4 called as a witness, I could testify competently to the matters stated here.

5 2. My attorneys in this action are Nathan & Associates, APC and Righetti Glugoski, P.C.

6 3. I worked for Defendant M.A.C. Cosmetics Inc. ("Defendant") in California from
7 approximately 2016 through 2021. I was a non-exempt hourly employee of Defendant throughout my
8 employment with Defendant as a salesperson.

9 4. The purpose this case was to recover unpaid wages, premiums for meal and rest break
10 violations, reimbursement of business expenses, penalties for inaccurate wage statements, and penalties
11 for labor code violations. I'm bringing this case on behalf of current and former employees of Defendant
12 who worked as non-exempt employees.

13 5. In March 2022, I first spoke with attorney Reuben Nathan. At that point, I was just a
14 witness, but during our phone call I asked how I could get more involved because I felt strongly about
15 how we were being treated—like being required to buy products as part of the job. Soon after, I officially
16 hired Nathan & Associates to represent me. My earliest calls with Mr. Nathan lasted around 20 minutes
17 each.

18 6. In those early conversations, Mr. Nathan asked me to look for documents, emails, phone
19 logs, and anything else I had from my time working at M.A.C.

20 7. I also had several long conversations with attorney John Glugoski about the case. Our
21 phone calls lasted in total more than 2 hours in addition to the time I spent speaking to Mr. Nathan.

22 8. Over the next five months, I spent about 25 hours reaching out to and locating former
23 coworkers who could be witnesses.

24 9. From April to September 2022, I spent approximately 50 hours looking for and
25 organizing documents and other items in my home, including trips to storage and my garage, and then
26 passing those along to my attorneys. In addition to going through boxes and boxes of documents,
27 searching e-mails, I reached out to other employees who I believe might have helpful memos and
28

1 directives from the company concerning things like event days, promotions and schematics showing the
2 amount of time we were required to spent creating the MAC look.

3 10. I also spent about 1.5 hours reading, signing my retainer agreement, and reviewing draft
4 versions of the complaint with my attorneys.

5 11. I prepared for depositions three different times after being told mine would be scheduled.
6 I estimate I spent about 15 hours to get ready, including reviewing paperwork.

7 12. On April 26, 2024, I attended my deposition, which lasted roughly 7 hours plus an
8 additional 1.5 hours of prep time that day.

9 13. I spent about 20-25 hours working with my attorneys to answer written questions and
10 gather documents. This included going through all my social media messages and photos so we could
11 provide what the defendant asked for.

12 14. Reviewing all the complaints, including the PAGA action and the Leyva action, took me
13 about 5 hours.

14 15. I spent another 8 hours looking at the documents M.A.C. turned over, including my
15 employee records, both before and after mediation. I worked closely with my lawyers and the expert to
16 go through all these materials and answer questions about damages and numbers.

17 16. I was present at the mediation session as required by my attorneys, and talked with them
18 before, during, and after. In total, I spent about 9 hours on this mediation

19 17. There were several times I had to miss work events or meetings because of the lawsuit. I
20 lost income when I had to take time off or cancel other obligations so I could respond to discovery,
21 prepare for my deposition, or attend mediation. I missed a few work social events which would have
22 also generated business for me. I estimate I lost thousands of dollars because of my participation in this
23 case.

24 18. In total, I have spent more than 150 hours helping with this case and supporting my legal
25 team in every way I could.

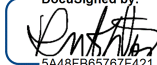
26 19. Because I filed this class action against MAC, MAC had concerns that I might sue them
27 again for something else. MAC insisted I enter into a general release to settle any potential claim I might
28 have against them in addition to the one's covered by this lawsuit so that the parties could have finality.

1 Although I was reluctant to enter into a general release, I understood that the recovery for the class and
2 MAC's goal of putting not only this class action behind them but also any potential disputes I might have
3 against them was important to MAC.

4 20. I believe the time and effort I put in helped move this case forward and made a real
5 difference in reaching a good result. I am asking the Court to approve the award of \$20,000.00, which
6 is just 0.0017% of the total settlement.

7 I declare under penalty of perjury under the laws of the State of California and the United States
8 of America that the foregoing is true and correct.

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DocuSigned by:

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Ruth Torres