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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF PLACER

KRISTYNA YOUNG, on behalf of herself and all others similarly situated, Plaintiff, vs. BOREAL RIDGE CORPORATION, a California corporation; BOREAL RIDGE SKI RESORT, an entity of unknown form; BOREAL MOUNTAIN RESORT, an entity of unknown form; POWDR CORP., a Delaware corporation; and DOES 1 through 50, inclusive, Defendants.	Case No. S-CV-0055093 *[Assigned for all purposes to the Hon. Trisha Hirashima, Dept. 32]* **DECLARATION OF ROMAN SHKODNIK IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Date: November 10, 2026 Time: 8:30 a.m. Dept.: 32 Complaint filed: April 21, 2025 FAC filed: June 25, 2025 SAC filed: August 6, 2026 Trial date: None set

DECLARATION OF ROMAN SHKODNIK

I, Roman Shkodnik, declare:

1. I am an attorney licensed and admitted to practice before all courts of the State of California, the United States District Court for the Central, Southern, Eastern, and Northern Districts of California, and the Ninth Circuit Court of Appeals. I am a senior attorney of D.Law, Inc., counsel for Plaintiffs Kristyna Young and Michael Delarm ("Plaintiffs") on behalf of themselves and similarly situated employees of Defendants Boreal Ridge Corporation and Powdr Corp. ("Defendants"). I and my firm are referred to herein as Class Counsel. I have personal knowledge of the facts herein and if called as a witness, I could and would competently testify.

2. On April 21, 2025, Plaintiff Young filed a class action complaint against Boreal Ridge Ski Resort, Boreal Mountain Resort, and Defendants in the Superior Court of California, County of Placer entitled *Kristyna Young v. Boreal Ridge Corporation, et al*., Case No. S-CV-0055093.

3. On April 21, 2025, Plaintiff Young filed a written notice with the California Labor & Workforce Development Agency ("LWDA") alleging that Defendants violated Labor Code §§ 201, 202, 203, 204, 210, 218.5, 218.6, 226, 226.3, 226.7, 227.3, 245, *et seq*., 246, 510, 512, 558, 558.1, 1174, 1174.5, 1182.12, 1185, 1194, 1194.2 1197, 1198, 1199, 2698, 2699, *et seq*., and 2802, pursuant to Labor Code § 2699. Attached hereto as **Exhibit A** is a true and correct copy of the written notice to the LWDA.

4. On June 25, 2025, Plaintiff Young filed a First Amended Complaint adding a cause of action for penalties pursuant to the Private Attorneys General Act ("PAGA").

5. On August 5, 2025, Plaintiff Young dismissed named defendants Boreal Ridge Ski Resort and Boreal Mountain Resort without prejudice.

6. On December 2, 2025, Plaintiffs Young and Delarm amended the Young PAGA Notice, which was timely provided to Defendants and the LWDA. Attached hereto as **Exhibit B** is a true and correct copy of the written amended notice to the LWDA.

7. After reaching a settlement at mediation, on August 6, 2026, Plaintiff Young filed a Second Amended Complaint consolidated the claims alleged in *Nobles v. Boreal Ridge Corporation, et al*., Case No. CU0002063, and adding Michael Delarm and Jewel Nobles as

named plaintiffs.

8. Plaintiffs authorized a split of attorneys' fees, providing that any attorneys' fees recovered in this action will be split between Plaintiffs' counsel and counsel for Plaintiff Jewel Nobles.

QUALIFICATIONS AND ADEQUACY OF CLASS COUNSEL

9. My firm is well qualified because of our experience, knowledge, and resources to act as counsel and represent Plaintiffs and the putative class in this action. My practice is exclusively focused on employment matters, with a substantial percentage devoted to litigating wage, hour, and working-conditions violations on a class-wide basis.

10. I received my Bachelor of Arts in history and political science from the University of California, Los Angeles, in 2007. I then earned my Juris Doctorate from Loyola Law School in May of 2011. Upon graduating from law school, I have exclusively focused my practice on representing employees including in wage-and-hour class actions.

11. I have been practicing law since 2012. Since 2013, I have focused almost exclusively on representing employees, including in wage-and-hour class actions. During my career I have represented employees in over 100 wage-and-hour class action lawsuits as lead or co-lead counsel (including in the Central, Southern, Eastern and Northern Districts of California), and I have obtained six and seven figure settlements against a range of defendants, including Fortune 500 companies. These cases have involved the gamut of wage-and-hour claims, including claims for failure to pay minimum wages, unpaid wages and overtime, inaccurate pay statements, and failure to pay timely wages - similar to claims at issue in the present matter.

12. I am experienced in prosecuting employment matters, particularly class actions. In addition to the present case, I am also class counsel for dozens of other putative wage-and-hour class-action lawsuits pending in various state and federal jurisdictions throughout California.

13. My extensive experience in litigating employment wage and hour matters has been integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and generally negotiating fair and reasonable class action settlements. Practice in the narrow field of wage and hour litigation requires skill and knowledge concerning the constantly evolving

substantive law (state and federal), as well as the procedural law of class action litigation. In this action, I am fully equipped to use the skills and knowledge I have developed through more than a decade of prosecuting and defending wage and hour class actions to fairly and adequately represent the interests of the Class. Therefore, on the account of my resources, experience, and knowledge, I am well qualified to act as Class Counsel and represent Plaintiffs and the putative Class Members in this action.

14. Owing to my experience, I am well qualified to evaluate the class claims in this action, to evaluate settlement v. trial and defenses raised. The following are examples of some of my cases that have resulted in favorable settlements for the employee Class Members and Aggrieved Employees I have represented: (a) *Bogues v. Ikes place #6*, San Diego Superior Court, Case No. 37-2020-00023727-CU-OE-CTL (Hon. Robert Longstreth); (b) *Garcia v. Statewide Traffic Safety And Signs, Inc.*, Orange County Superior Court, Case No. 30-2018-01011814-CU-OE-CXC (Hon. Lon F. Hurwitz); (c) *Brito v. Brothers International Desserts dba Brothers International Desserts Inc*., Orange County Superior Court, Case No. 30-2022-01242515-CU-OE-CXC (Hon. William D. Claster); (d) *Valenzuela v. Best Express Foods, Inc.*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2021-4131 (Hon. Robert T. Waters); (e) *Ruem v. EMTS, Inc. et al.*, Fresno County Superior Court, Case No. 18CECG04441 (Hon. Kimberly Gaab); (f) *Quizon v. CF Watsonville East, LLC*., Santa Cruz County Superior Court, Case No. 20CV01868 (Hon. Paul Marigonda); (g) *Cesena v. JYM Enterprises, Inc.,* Los Angeles Superior Court, Case No. 21STCV27949 (Hon. Monica Bachner); (h) *In re Mobileone Wage And Hour Cases*, San Mateo Superior Court, Case No. JCCP 5039 (Hon. Marie S. Weiner); (i) *Ly v. Prime Comms Retail, LLC*, Sacramento County Superior Court, Case No. 34-2020-00281668 (Hon. Christopher E. Krueger); (j) *Savattieri et al.v. AMI Expeditionary Healthcare et al.*, Los Angeles County Superior Court, Case No. 21STCV33372 (Hon. Kenneth R. Freeman).

15. For purposes of this motion, the "Class" or "Class Members" means all non-exempt individuals that worked for Defendants in California as an hourly-paid or non-exempt employee at any time during the Class Period from April 21, 2021 through April 18, 2026. I do not believe that I have any conflicts of interest with the Class or with the Class Representatives. I am not

related to the Class Representatives. I have not previously represented Defendants in any matter. I respectfully submit that I, and D.Law, Inc. are well suited to act as Class Counsel in this action, and we have and will continue to vigorously represent the interests of the Class Members.

SETTLEMENT IS FAIR, REASONABLE, AND ADEQUATE

16. Based on Class Counsel's knowledge and expertise in class action litigation, Class Counsel believes this Settlement will provide a substantial benefit to the Class Members.

17. From Class Counsel's review of the facts, strengths, and weaknesses of the case, the risks and delays posed by further litigation, and Class Counsel's own prior litigation experience, Class Counsel believes that the recovery for each class member is fair, reasonable, and adequate taking into consideration the amounts received in other wage and hour class actions; the risks inherent in litigation of this genre, including numerous potential appellate issues; and the reasonable tailoring of each Class Member's claim to the settlement award he or she will receive. Class Counsel is aware of the burdens of proof necessary to establish liability for the claims asserted in the Action and the difficulties in establishing damages for Class Members. Further, the settlement negotiations were extensive and conducted in good faith and at arm's length between attorneys with substantial experience litigating class actions and wage and hour cases, the Settlement Agreement was the product of a non-collusive settlement process in which the Parties were forced to make significant compromises in the interest of reaching a full and complete settlement of the lawsuit.

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

Executed this 13th of October 2026, at Pasadena, California.

Roman Shkodnik