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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF PLACER

KRISTYNA YOUNG, on behalf of herself and 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 KRISTYNA YOUNG IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF THE 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

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DECLARATION OF KRISTYNA YOUNG

I, Kristyna Young, declare as follows:

1. I am over the age of eighteen and I submit this Declaration in support of the Motion for Preliminary Approval of the Class Action Settlement in this matter. I have personal knowledge of the facts herein, and if called as a witness I could and would competently testify to them.

2. I am currently a resident of Matawan, New Jersey. I worked for Boreal Ridge Corporation and Powdr Corp. ("Defendants") as a nonexempt hourly employee from approximately December 7, 2023 to August 13, 2024. I retained the law firm of D.Law, Inc. to represent me in this class action lawsuit against Defendants for the alleged practices and violations as stated in the operative Complaint in this action.

3. I believe that I am similarly situated to all other Class Members who worked for Defendants during the Class Period and who were similarly affected by Defendants' policies and practices regarding payment of minimum wages and overtime, meal periods, rest breaks, payment of vacation and sick pay, reimbursement of necessary business expenditures, provision of accurate wage statements, final payment of wages to terminated or resigned employees, failure to failure to keep required payroll records, alleged violations of the unfair competition law, and alleged violations under the Private Attorney General's Act. I believe my claims against Defendants are typical of the other Class Members because I believe the claims asserted in the operative Complaint are also shared by the other Class Members.

4. Additionally, I believe that my interests have been and continue to be aligned with all Class Members, and I have been and am willing to continue to pursue the Class Members' claims vigorously on our collective behalf. As a result, I firmly believe that I do not have any interests that are adverse to the interests of the Class Members.

5. As a Class Representative, I believe I have maintained the best interests of the Class Members. I have actively participated in this litigation and have been continuously apprised of the progress of the case. I have provided documents and evidence to Class Counsel in support of the class claims. I have also invested significant time and efforts in performing my duties on

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behalf of the Class, including communicating with Class Counsel regarding the claims, being available to answer questions, preparing for settlement negotiations, and reviewing the proposed Settlement. I devoted numerous hours of my time to all of the above tasks to vigorously represent the interests of the Settlement Class.

6. I believe the Settlement obtained on behalf of the Settlement Class is fair and reasonable in view of the facts, claims and the risk of going through further litigation in this case.

7. I have not yet received any consideration or promises that are different than any of the other Class Members. In my opinion, the requested enhancement award of $7,500.00 is fair and reasonable given the risks I have taken, the tasks I have performed, the time I have invested, and the real benefit which the Class Members will receive from this class action. I view this settlement as fair and reasonable to all Class Members.

8. I freely chose to champion the interests of the Class and freely accepted the risks of being a Class Representative in a class action that could stigmatize me and, although unknown at this time, may affect my future employability in this industry or any other industry. I also do not believe my decision to accept the Settlement and proposed $7,500.00 enhancement award compromised my duty to protect the interest of the Class. I also understand the $7,500.00 enhancement award is subject to the Court's approval and discretion. Furthermore, although there is no record of such activity, I accepted the real risk of potentially being liable for the opposing parties' costs and attorneys' fees if I were unsuccessful in this lawsuit.

9. I understand that D.Law, Inc. and Wilshire Law Firm, PLC will share the attorneys' fees in this matter. I agreed to this in writing. I also understand that this fee sharing will not increase the amount of attorneys' fees.

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

Executed this 10/10/2026th day of ____, 2026 at Matawan, New Jersey.

Signed by:
kristyna Young
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Kristyna Young