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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 JEWEL NOBLES IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Preliminary Approval Hearing:
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

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DECLARATION OF JEWEL NOBLES

I, Jewel Nobles, declare as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am a named plaintiff in the above-captioned case and have personal knowledge of the facts set forth here. If called upon to testify, I could and would do so competently under oath.

2. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

3. I am former employee of Defendants Boreal Ridge Corporation and Powdr Corp. ("Defendants"). I worked for Defendants in California as an hourly-paid, non-exempt employee from approximately December 2023 to March 2025. I believe my experiences are similar to those of other class members because we were all subject to the same employment policies and practices.

4. I initiated a lawsuit against Defendants because I was concerned that I was not paid correctly for all the hours that I worked, including because I was not provided all the meal and rest breaks to which I was entitled, and I wanted Defendants to change their policies and improve employees' working conditions.

5. I understand that it is my duty as a potential class representative to put the best interests of the class above my own, personal interests and that I have a responsibility to understand the claims, keep updated about the progress of the lawsuit, and assist my attorneys.

6. I believe that I have demonstrated my ability to advocate for the interests of the class by pursuing this lawsuit and spending a substantial amount of time on the litigation. Among other things, I spent time searching for and reviewing documents related to my employment with Defendants to provide to my attorneys and communicating with Wilshire Law Firm regarding my experiences working for Defendants, the status of the case, preparing and being available for mediation, and the proposed settlement. After mediation, I reviewed the settlement papers and stayed in touch with my attorneys regarding progress.

7. I believe that my commitment to the litigation has also demonstrated my ability to act on behalf of the State as a private attorney general.

8. I estimate that since I retained Wilshire Law Firm in March 2025, I have spent

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approximately 50 hours on these activities, and I estimate that I will spend an additional 1-3 hours assisting my attorneys through the approval process and disbursement of the settlement funds.

9. I am glad, and also relieved, that I was able to represent the class in this lawsuit and recover money for them through this settlement, in addition to letting Defendants know that their policies and practices have to change. The recovery of civil penalties under the Private Attorneys General Act ("PAGA") can only emphasize that.

10. I believe that this settlement is fair, adequate, and reasonable, as my attorneys have explained the standard to me, and a good result for employees and the general public. I respectfully ask the Court to approve it.

11. When I decided to become involved in this lawsuit, both as a class representative and as a private attorney general, I was aware that being the named plaintiff in a class action could subject me to unwanted attention because prospective employers could find out that I sued Defendant after being employed by them, and I understand that a permanent public record of this lawsuit is publicly available. In addition, as of the date of this declaration, the class notice will be mailed to approximately 1,385 class members to inform them that I filed this class action against Defendants. This exposure creates a risk for my future job prospects, since class members may move to different companies within the industry or know people at other companies who may not want to hire someone who sued her employer.

12. I was also aware that, as a named plaintiff, I might be responsible for some or all of Defendants' legal costs if we were not successful. Knowing these risks, I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

13. Furthermore, I understood that a class action can also take a long time, even several years, and require my attention and efforts until it's resolved and that, even if we won at trial, the case could be delayed even longer by appeals.

14. Ultimately, despite these financial and reputational risks, I felt that my claims were important because Defendants' conduct hurts everyone and should change.

15. I am not aware of any conflicts with other class members, with the State, or with other aggrieved employees that would interfere with my ability to represent them.

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16. To the contrary, I believe my interests are the same as other class members' because we were all subject to the same policies and practices and suffered the same injury as a result.

17. Aside from the service award the settlement provides me, the benefit I will receive from the settlement is the same as other employees, and while other class members are only releasing the wage and hour claims alleged in the lawsuit, I agreed to a general release of claims against Defendants.

18. I believe my involvement in this case resulted in the benefits provided to other class members and aggrieved employees, including those who were vulnerable or too afraid to say anything because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was willing to accept that risk on their behalf, as well as my own, and will continue to participate actively in this lawsuit as needed.

19. I reviewed the Class Action and PAGA Settlement Agreement in full, and my attorneys answered my questions. I believe the settlement terms and distributions are fair, adequate, and reasonable given the circumstances of my employment with Defendants.

20. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

21. I am not aware of any actual or potential conflicts of interest with CPT Group, Inc., the proposed settlement administrator, nor am I aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the settlement.

22. 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 on 9/24/2026, at Reno, Nevada.

Signed by:
73E49CD309D04B8...
Jewel Nobles