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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

AMANDA SAINZ, individually, and on behalf of
others similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act;

Plaintiff,

vs.

SHOE PALACE CORPORATION, a California
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 22STCV38093

Honorable Timothy Patrick Dillon
Department 15

**DECLARATION OF AMANDA SAINZ IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LABOR CODE § 2698,
ET SEQ.) SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: November 4, 2025
Time: 10:00 a.m.
Department: 15

Complaint Filed: December 6, 2022
Trial Date: None Set

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I, **Amanda Sainz**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Shoe Palace Corporation (“Defendant”) from approximately August 2019 to approximately May 2022 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for several hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for many hours discussing my situation, representative action lawsuits under the Private Attorney General Act (“PAGA”), and what it meant to bring a PAGA Action and be a PAGA representative.

3. I have spent several hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendant reviewing documents with my attorneys, providing information regarding the duties of aggrieved employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent many hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent several hours reviewing the settlement agreement and asking

1 questions and discussing the potential settlement with my attorneys before signing the settlement
2 agreement.

3 6. I believe that I have done everything that my attorneys have asked of me and have tried,
4 to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think
5 my efforts helped to get the result obtained in this case.

6 7. For my broader individual waiver and release of claims with a California Civil Code
7 Section 1542 waiver (set forth in Section 9(b) of the Settlement Agreement), the Settlement provides for
8 a General Release Fee in the amount of \$7,500.00, to be paid out of the Total Settlement Amount, subject
9 to Court approval. I respectfully request that the Court award me full payment of the General Release
10 Fee.

11 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

12 9. I have not entered into any undisclosed agreements, nor have I received any undisclosed
13 compensation in this case. The only compensation I will receive is whatever amount the Court awards as
14 a general release fee, as well as my share of the settlement as an aggrieved employee.

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

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18 Executed this 7 day of August ~~July~~, 2025, at Hacienda Heights, California.

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