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SUPERIOR COURT OF CALIFORNIA

COUNTY OF PLACER

MAZIE MARTIN, individually and on behalf of similarly situated employees, Plaintiff, v. TWIN ROCKS ESTATE VINEYARDS AND WINERY, INC., a California Corporation; ANGELA SEHR, an individual; JIM SEHR, an individual; and DOES 1 through 25, inclusive, Defendants.	CASE NO.: S-CV0055350 **DECLARATION OF SUSANA MULLEN IN SUPPORT OF MOTION FOR APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

I, Susana Mullen, declare:

1. I am a competent adult, and I have personal knowledge of the facts set forth in this declaration. I am making this declaration on behalf of myself, and in support of the Motion for Approval of Class Action and PAGA Settlement.

2. I worked for Defendants Twin Rocks Estate Vineyards and Winery Inc., Angela Sehr and Jim Sehr ("Defendants") as a hostess from June 2023 to September 2023, wine club coordinator from September 2023 to February 2024 and tasting room manager from February 2024 to August 2024. I was subject to all of Defendants' policies and practices that have been alleged as unlawful in the Complaint and the notice sent to the Labor and Workforce Development Agency ("LWDA"), including the following: failure to pay all wages, failure to pay overtime wages, failure to provide meal periods or pay meal period premiums in lieu thereof, failure to provide rest periods or pay rest period premiums in lieu thereof, failure to provide

accurate wage statements, failure to timely pay final wages, failure to provide paid sick leave, failure to pay all tips, failure to reimburse expenses, and engaging in unfair business practices.

3. I have actively participated in the litigation of this case for the benefit of all Class Members. I worked with NorCal Advocates, to investigate the claims, discuss the facts of the case, provide and explain the context behind the documents I had to support the claims, and I provided over fifteen (15) other employees who were willing to give testimony for this case and signed declarations. I also discussed the case with Mazie Martin to help ensure a positive outcome.

4. I understand the risks and benefits of bringing a class action and a claim under the Private Attorneys General Act ("PAGA"). I understand that pursuing the case as a class and PAGA action means that it will take substantially longer than pursuing my claims individually, whether in Court or with the California Labor Commissioner. However, I believed it was important to make sure that Defendants' policies and practices complied with the law and Class Members were given the rights they were due. I undertook a professional risk in pursuing the case as a class and PAGA action because my name would be on a publicly available document showing that I participated in litigation against my former employer.

5. During the course of this litigation, I have given detailed accounts of all the facts related to my employment. I provided NorCal Advocates with extensive documentation that I believe supports the claims brought against Defendants. I assisted NorCal Advocates in understanding these documents and providing context for Defendants' employment and payroll processes as they applied to me and how I believed they applied to Defendants' other employees within the class. I worked there for multiple years and had multiple different positions, so I was able to attest to the similarities of the wage and hour policies and practices among all Class Members.

6. The work I performed for this case included reviewing and collecting documents to show and explain to NorCal Advocates what was happening and why I thought it was unlawful. For example, I explained to my attorneys my job duties and responsibilities, the type of tasks and work performed in a typical day and any circumstances that would cause relevant

differences to my daily work that affected the class claims. I also explained job duties and responsibilities for other class members and provided numerous witnesses who gave testimony.

7. I participated in the negotiations and settlement discussions in this case, including participating in the mediation by phone, providing any additional information needed to assist the negotiations, and discussing the potential terms of the Agreement to evaluate its adequacy. Throughout the course of this litigation, I have ensured that sure steps were continually taken to advance the interests of Class Members.

8. To date, I estimate that I have spent approximately 120 hours assisting with this case. I expect once the Notice of Settlement is mailed, I will spend additional time because Class Members will likely reach out to me about the notice and the process for receiving payment.

9. Other than what is provided for in the settlement agreement, I have not received any benefits as a result of filing this lawsuit. I have spent a substantial amount of time in this case, securing a monetary benefit for many individuals who have not had to do anything whatsoever to have the opportunity to receive it. The time I have spent on this case has had to occur during my lunch and/or break times, after hours, and on my days off. I believe awarding the full Enhancement Payment is warranted given the amount time I have contributed to the case since 2024, the benefit secured for Class Members and the LWDA, and the burdens I have experienced as a result of this litigation.

10. I understand that any Enhancement Payment I may receive is for my participation as a Class Representative.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 07/02/2026, in Roseville, California.

Susana Mullen (Jul 2, 2026 14:38:04 PDT)

Susana Mullen