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Attorneys for Defendant Jacques Moret, Inc.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

KARLA MEJIA JIMENEZ, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

JACQUES MORET, INC., a New York
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: CVRI2204441

[Assigned for all purposes to the Hon. Harold
Hopp]

CLASS ACTION

**DECLARATION OF WENDY LANE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: May 22, 2025
Time: 8:30 a.m.
Courtroom: Dept. 1
Judge: Hon. Harold Hopp

Reservation ID: **728108743225**

Action Filed: October 13, 2022
Trial Date: Not Set

DECLARATION OF WENDY LANE

I, Wendy Lane, declare:

1. I am a partner at the law firm of Greenberg Glusker Fields Claman & Machtinger LLP, attorney of record for Defendant Jacques Moret, Inc. ("Moret") in this action. I am an attorney at law duly admitted to practice before all the courts of the State of California and I am making this declaration on behalf of Moret. The facts herein are personally known to me and I have first-hand knowledge thereof. If called as a witness, I could and would competently testify thereto.

2. This declaration is submitted in connection with Plaintiff's Motion for Preliminary Approval of Class Action Settlement, pursuant to this Court's Class Action Management Order ("CMO") at Number 1, paragraph H.3.b.

3. I have completed a diligent search and reasonable inquiry and am not aware of any similar class, representative, or collective action in this or any other jurisdiction that asserts claims similar to those asserted in this action on behalf of a class or group of individuals some or all of whom would also be members of the class defined in this action ("Similar Actions"). (CMO # 1, ¶ H.3.b(i)).

4. I conducted the following research to determine whether there are any Similar Actions, pursuant to the CMO, at Number 1, paragraph H.3.b(ii):

a. On March 4, 2025, my office performed two electronic searches using Westlaw and CasePortal/CourtHouse News Service to search for any Similar Actions. These search results disclosed no Similar Actions.

b. Without waiving any privilege, on or about March 7, 2025, I communicated with an authorized representative of Moret about whether he had any knowledge of Similar Actions, and the representative, who is in position to know about any such Similar Actions, confirmed he does not.

c. On March 10, 2025, I asked two other employment law attorneys at my firm whether they had knowledge of any Similar Actions, and they do not.

I declare under penalty of perjury under the laws of the State of California that the

foregoing is true and correct.

Executed on the 19th of March, 2025 at Los Angeles, California.



Wendy Lane

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I am employed in the State of California, County of Los Angeles. I am over the age of 18 and not a party to the within suit; my business address is 725 S. Figueroa St., Suite 3100, Los Angeles, CA 90017.

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[] **BY MAIL (ENCLOSED IN A SEALED ENVELOPE):** I deposited the envelope(s) for mailing in the ordinary course of business at Los Angeles, California. I am “readily familiar” with this firm’s practice of collection and processing correspondence for mailing. Under that practice, sealed envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

[] **BY ELECTRONIC SERVICE:** Pursuant to the Court's Order directing Electronic Service, the above-named document(s) has (have) been electronically served on counsel of record by an approved electronic service provider. The transmission of these documents was reported complete and a copy of the service confirmation will be maintained, along with the original document(s) and proof of service in our office.

[] **BY OVERNIGHT DELIVERY:** I am “readily familiar” with this firm’s practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

H. Scott Leviant
Type or Print Name


Signature