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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

DAISY MARTINEZ, as an individual and on behalf of all other aggrieved employees,

Plaintiff,

vs.

VF OUTDOOR, LLC, a Delaware Limited Liability Company; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 26CU022273C

[*Assigned for all purposes to the Hon. Gregory W. Pollack, Dept. C-71*]

DECLARATION OF PLAINTIFF DAISY MARTINEZ IN SUPPORT OF *EX PARTE* APPLICATION REGARDING JOINT STIPULATION TO APPROVE SETTLEMENT OF CLAIMS BROUGHT UNDER THE PRIVATE ATTORNEYS GENERAL ACT, LABOR CODE § 2698, ET SEQ.

Date: October 29, 2026
Time: 8:45 a.m.
Dept.: C-71

Action Filed: April 22, 2025
Trial Date: None Set

DECLARATION OF DAISY MARTINEZ

I, Daisy Martinez, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed settlement ("Settlement") reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. Defendant VF Outdoor, LLC ("Defendant") employed me as a non-exempt "Sales Associate" at their "Vans" retail stores in Irvine and Tustin, California from approximately 2016 until approximately 2026. Throughout my employment with Defendant, my job duties consisted of helping customers purchase products at the cash register, handling inventory and merchandise, and re-stocking product for the storefront.

3. Throughout my employment with Defendant, Defendant required me to complete a multi-step log-in process every time I clocked in for my shifts. Specifically, I was required to log on to Defendant's computer with my email and password in order to receive a code to my personal cellular phone. After I received a code, I used that code to finally clock in to my shifts on Defendant's computer. I had to complete this process before I started my shifts at the beginning of my workday and when I was required to clock back after my meal periods. I was neither compensated for this time before my shifts started nor before I clocked back in after my meal periods.

4. Further, Defendant also required me to undergo security screenings at the end of every shift, *after* I clocked out. Specifically, Defendant's inspected my personal belongings, including any bags or backpacks, any time I left the store. This included the end of my shifts or if I left the store and came back after a meal period. I was not paid for this time I spent undergoing security screenings after I clocked out of my shifts. Moreover, when I was scheduled for a closing shift, I had to wait until the entire store was closed before a supervisor inspected my personal belongings.

5. Moreover, Defendant's supervisors frequently texted my cellular phone when I was not working with store promotions I needed to know to relay to customers during my upcoming

shifts. Even though Defendant required me to use my personal cellular phone to communicate with my supervisors, Defendant did not reimburse any portion of my cellular phone bill.

6. I brought this lawsuit because I felt that Defendant was not following the law, and I wanted Defendant to comply with the law and treat its employees fairly. I feel that I have taken on a greater burden than any of the other aggrieved employees because I have been actively involved in the litigation since it began, and because it is my name that is attached to the lawsuit. Although I was aware that I would be filing a public lawsuit, I chose to move forward with the case anyway. Through my efforts, Defendant has agreed to a settlement that will benefit current and former employees of Defendant, and I believe that I should be compensated for carrying the burden of this litigation for the benefit of the other employees.

7. I have been actively involved in this case since before it was even filed. Among other things, I searched for relevant documents for use in the lawsuit, provided factual information and relevant documents to my attorneys, had many phone calls with my attorneys to discuss the claims in the lawsuit and Defendant's practices, assisted my attorneys to help them prepare for mediation, made myself available throughout mediation and answered factual questions raised by the mediator, reviewed and provided input regarding the settlement in this case, and otherwise assisted my attorneys in moving this case towards resolution. I estimate that I have spent approximately 15 to 20 hours in total on these activities.

8. I have no interest, monetary or otherwise, in Phoenix Settlement Administrators. I did not select Phoenix Settlement Administrators because of any relationship or benefit to me, and I will not receive anything from Phoenix Settlement Administrators other than any Court-approved payment issued in the ordinary course of administering the Settlement.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on Jul 10, 2, 2026, at Tustin, California.

Daisy Martinez (Jul 10, 2026 17:39:27 PDT)

Daisy Martinez