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Attorneys for Plaintiff DANIEL ALCOSER, individually, and on behalf of other similarly situated employees, and Aggrieved Employees pursuant to the California Private Attorneys General Act

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF KERN

DANIEL ALCOSER, individually, and on behalf of other similarly situated employees, and Aggrieved Employees pursuant to the California Private Attorneys General Act,

Plaintiff,

vs.

CVS PHARMACY, INC.; GARFIELD BEACH CVS, L.L.C.; CVS HEALTH CORPORATION; LONGS DRUG STORES CALIFORNIA, LLC; and DOES 1 through 25, inclusive,

Defendants.

Case No.: 26CUB02765

Honorable Gregory A. Pulskamp
Department / Division J

DECLARATION OF PLAINTIFF DANIEL ALCOSER IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

DECLARATION OF DANIEL ALCOSER

I, Daniel Alcoser, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State 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 Defendants CVS Pharmacy, Inc., Garfield Beach CVS, L.L.C., Longs Drug Stores California, L.L.C., and CVS Health Corporation (together, "Defendants" or "CVS") from approximately March 2020 through approximately February 2024 as a Store Manager, and later as a Store Team Leader, and finally a Pharmacy Technician. During a substantial portion of my employment, I was classified as exempt, although my day-to-day duties were primarily non-managerial in nature; on or about September 18, 2022, Defendants began paying me and certain other similarly situated employees on an hourly, non-exempt basis.

3. Because I thought the practices at CVS may not be lawful, I decided to seek legal advice about my work experiences at CVS and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure CVS was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with CVS, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Defendants.

5. 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. I made myself available to answer any questions my attorneys had about CVS' practices and treatment of their employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.

6. I understood that in the event this matter did not settle and proceeded with trial, I would need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any responsibilities that are necessary for this lawsuit.

7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also understood there was a risk of losing any job and/or income due to the time that I would have to spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In contrast, the other employees who will be receiving money from this lawsuit did not have to file a claim or take the risk that I took in bringing this action.

8. I reviewed the settlement agreement, discussed the settlement agreement with my attorneys, and asked them questions before signing it.

9. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California. I have spent approximately 35-40 hours participating in this case as described above. I believe my efforts helped get the result obtained in this case.

10. I understand that any resolution of this lawsuit on a class wide basis is subject to court approval, and any settlement must be designed in the best interest of the Class as a whole. At all times throughout the course of this litigation I have considered the interests of the Class and put them before my own personal interests.

11. I understand that incentive or enhancement awards are discretionary and intended to compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA action, and an acknowledgment of the benefits resulting from the representative's actions. I believe my work in this matter is meritorious on these points for the reasons set forth above.

12. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of $7,500 for my efforts and service in this case. I believe this amount is reasonable in light of my active participation in the litigation, including the time I spent communicating with my attorneys, and providing information and documents. I also understand that, as part of the settlement, I am providing a broader, general release of all claims that I have or may have against the defendants in this action in connection with the settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

13. I am not related to anyone associated with Blackstone Law, APC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 10/02/2026, at La Mesa, California.

Daniel Alcoser

Daniel Alcoser