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Attorneys for Plaintiff,
ANABEL MADRIGAL, individually and
on behalf of other persons similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

YVONNE LABRA and ANABEL MADRIGAL,
individually, on a representative basis, and on
behalf of all others similarly situated,

Plaintiff,

vs.

PENN EMBLEM COMPANY, a
Pennsylvania Corporation; and DOES 1
through 20, inclusive,

Defendants.

CASE NO.: CVRI2300385

[Assigned for All Purposes to Hon. Harold
W. Hopp, Dept 1]

CLASS ACTION

**DECLARATION OF PLAINTIFF
ANABEL MADRIGAL IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 5, 2025

Time: 8:30 a.m.

Dept.: 1

Action Filed: June 29, 2023

FAC Filed: April 17, 2023

SAC Filed: March 7, 2025

Trial Date: None

DECLARATION OF ANABEL MADRIGAL

I, Anabel Madrigal, hereby declare as follows:

1. I am one of the named plaintiffs in the above-entitled action, *Labra, et al. v. Penn Emblem Company*, Riverside County Superior Court Case No. CVRI2300385. I make this declaration on the basis of personal firsthand knowledge, except as to those matters stated on information and belief. If called as a witness, I could and would readily and competently testify to all matters stated within.

2. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.

3. I worked for defendant Penn Emblem Company ("Defendant") as a sales associate (commonly termed a "budtender" in the cannabis industry) at Penn Emblem Company, a dispensary in Jurupa Valley, California location from approximately May 24, 2021 to February 7, 2023.

4. I have spent approximately 35 hours on the case, including but not limited to intake and sign up interviews, meetings with my attorneys, producing relevant documents and information, responding to questions from my attorneys in preparation for mediation, participating in settlement negotiations, and reviewing the settlement agreement.

5. I fully realized the risks I would be taking by pursuing this class action as a named plaintiff and proposed class representative. I knew that future employers might conduct a background check on me or otherwise find out about my participation in the lawsuit against a previous employer and might retaliate against me as a result. I also knew that, as a class representative, I would be bearing risks that the absent class members would not be facing.

6. I also knew that I placed myself at a substantial risk because if Defendant were to prevail in this action, I could have been liable for Defendant's litigation costs. Despite this, I felt so strongly about standing up for the rights of Defendant's employees that I initiated and participated fully in this lawsuit.

7. From the time I became a class representative, I took an active role in participating in decisions about the case, including decisions concerning settlement. I maintained regular contact with my attorneys throughout the litigation to provide them additional information and to keep

1 myself informed of the developments in the case. I made sure that I understood everything that
2 was going on in the litigation so I could make the best informed decisions on behalf of the class
3 and myself.

4 8. As part of the Class Action and PAGA Settlement Agreement, I am releasing my
5 individual wage and hour claims against Defendant and waiving my rights under Civil Code § 1542
6 as to any and all claims against Defendant. I believe that I should receive an enhancement award,
7 in part, because this is a more comprehensive release than the release that is applicable to the other
8 class members.

9 9. I believe that the requested \$10,000.00 Class Representative Service Payment for
10 serving as a class representative is reasonable given the substantial time and effort I have expended
11 on behalf of the class and the risks I faced in serving as a named plaintiff and proposed class
12 representative. Based on my information and belief, approximately 700 class members will receive
13 the opportunity to participate in the settlement and to recover payment for the alleged wage and
14 hour violations. Because I put myself on the line, each class member did not have to expend his or
15 her own time and resources to pursue legal remedies individually. This action would not have been
16 possible without my active participation and my willingness to place myself at risk for the sake of
17 the other class members.

18 10. I know that without my efforts, this lawsuit would not have been brought on behalf
19 of other nonexempt employees of Defendant. Throughout the entire litigation, I did the best that I
20 could to represent the class and to look out for their interests.

21 I declare under penalty of perjury under the laws of the State of California that the foregoing
22 is true and correct. Executed on 12/05/2025 at Jurupa Valley, California.

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Anabel Madrigal (May 12, 2025 14:14 PDT)

25 ANABEL MADRIGAL
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