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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

RONALD STONE, GABRIELLA TOLOSA,
individually, and on behalf of other members of
the general public similarly situated and on
behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act;

Plaintiffs,

vs.

INGRAM MICRO, INC., a Delaware
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 30-2023-01313591-CU-OE-CXC

Honorable Melissa McCormick
Department CX105

CLASS ACTION

**DECLARATION OF RONALD STONE
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: May 7, 2026
Time: 2:00 p.m.
Department: CX105

Complaint Filed: March 20, 2023
FAC Filed: March 29, 2024
SAC Filed: June 18, 2024
Trial Date: None Set

DECLARATION OF RONALD STONE

I, Ronald Stone, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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 Defendant Ingram Micro, Inc. (“Defendant”) from approximately October 2017 to approximately February 2022 as an hourly-paid, non-exempt Level Four Operations Employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. 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.

1 4. In addition, I assisted my attorneys in preparing responses to Defendant's Notice of
2 Taking Deposition of Plaintiff and Request for Production of Documents at Deposition by
3 Defendant, and producing responsive documents. I prepared and appeared for my deposition in
4 connection with this matter on February 2, 2024. Subsequently, I spent time reviewing my
5 deposition transcript.

6 5. Throughout this matter, I was available to answer any questions my attorneys had,
7 and available to speak and meet with my attorneys whenever they needed me. I responded to them
8 as quickly as possible and gave them as much information and identified as many documents as I
9 could. I spent time speaking with my attorneys about the case, identifying potential witnesses,
10 providing my attorneys with documents and information concerning the case, and also describing
11 policies, practices, and procedures of Defendant.

12 6. As far as the settlement is concerned, I was available to review documents and
13 answer any questions my attorneys had. I reviewed the Mediator's Proposal and the Settlement
14 Agreement and discussed the questions I had regarding the potential settlement with my attorneys
15 before signing the settlement papers.

16 7. I understand that a settlement has been reached in my case and what my duties and
17 responsibilities are as a class and PAGA representative. For example, I am aware that if the
18 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,
19 and likely appoint me as the representative of the class and my attorneys as counsel for the class. I
20 also understand that my duties will include checking in on, monitoring, and conferring with my
21 attorneys to facilitate the notice and settlement administration process, and to provide information
22 that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate.
23 Further, if any individuals who are potential class members contact me, I will take steps to have
24 them referred to the Court-appointed settlement administrator so that these individuals may receive
25 the necessary information and notice they may be eligible to receive in connection with the
26 settlement and contemplated final approval hearing.

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1 8. I believe that I have done everything that my attorneys have asked of me and have
2 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
3 members and the State of California with respect to aggrieved employees. I have volunteered to
4 represent and champion the interests of many other people with similar claims and injuries because
5 of the importance of the case and the necessity that all class members and aggrieved employees
6 benefit from the lawsuit equally. I understand that as a proposed class representative, and if
7 formally appointed as a class representative, I have and continue to represent the interests of all
8 members of the class in litigation to recover relief for the class. As an hourly-paid, non-exempt
9 employee of Defendant who was subject to the same policies, practices, and procedures as the
10 other members of the class, I have claims that are typical of those of the class. I consider the
11 interests of the class just as I would consider my own interests. I understand that I may need to put
12 the interests of the class before my own interests, although I have no reason to believe that my
13 interests are in conflict with the interests of the class. I understand that any resolution of the
14 lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have
15 participated, and continue to participate, in the lawsuit as necessary. I have actively followed and
16 monitored the progress of the lawsuit, and have taken steps to make sure that the litigation is
17 prosecuted by the skilled and effective attorneys that I have retained.

18 9. I think my efforts helped to get the result obtained in this matter, and as a potential
19 class and PAGA representative, I respectfully request that the Court award me a service payment
20 for my efforts in pursuing and participating in this matter, as well as my broader release of claims.
21 Taking into consideration the time that I have dedicated to this matter, I believe that this amount is
22 reasonable.

23 10. I am not related to anyone associated with Lawyers *for* Justice, PC or Aegis Law
24 Firm, PC.

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11. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as a service payment, as well as my share of the settlement as a class member and aggrieved employee.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. 02/10/2026

Executed on this ____ day of February 2026, at Adelanto, California.

Electronically Signed
2026-02-10 19:46:15 UTC - 146.75.146.72
Nintex AssureSign®
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Ronald Stone