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Attorneys for Plaintiff ALBA SOTO,
as an individual and on behalf of all employees
similarly situated

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

ALBA SOTO, individually, and on behalf of
all others similarly situated,

Plaintiff,

vs.

STINE ENTERPRISES INC., an Arizona
Corporation; and DOES 1 through 10,
inclusive,

Defendants

Case No.: ECU004358

[Assigned for all purposes to Hon. Jeffrey B.
Jones, Dept. 5]

**DECLARATION OF ALBA SOTO IN
SUPPORT OF PLAINTIFF'S MOTION FOR
AN ORDER APPROVING SETTLEMENT
OF CLAIMS BROUGHT PURSUANT TO
THE PRIVATE ATTORNEY GENERAL'S
ACT OF 2004**

Date: June 10, 2026
Time: 8:30 a.m.
Courtroom: Dept. 5
Judge: Hon. Jeffrey B. Jones

Action Filed: October 13, 2025
Trial Date: Not Set

DECLARATION OF ALBA SOTO

I, ALBA SOTO, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter against Defendant STINE ENTERPRISES INC. ("Defendant"). This declaration is submitted in support of approval of the Settlement Agreement 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. I worked for Defendant as an hourly-paid, non-exempt employee from June 9, 2023 to April 2026.

3. When I worked for Defendant, I was subjected to the same labor code claims involving regular rate, off -the- clock work, meal breaks, rest breaks, wage statements, failure to reimburse necessary business expenses and failure to pay all wages due to terminated employees.

4. I have been actively involved in this case. My participation began with bringing certain issues that are involved in this matter to my counsel's attention and explaining the factual background that was used to prosecute the claims in this case. I have had many discussions with my attorneys regarding Defendant's wage and hour policies, my claims in this case, litigation strategy, potential witnesses, updates on how the case was proceeding, and how I could help the case. For example, I remained in regular communication with my attorneys regarding mediation discovery and settlement discussions that the parties had during the course of litigation and mediation. I also provided information and documents to my attorneys to assist them in preparing the case. I also spent time reviewing and discussing the Settlement Agreement as well as other documents from my attorneys, and reviewing my own records for documents that would be potentially relevant to the case.

5. When I filed this lawsuit, I understood that this lawsuit could benefit my former co-workers, other Defendant's employees, and the State of California by helping to recover civil penalties on their behalf as a result of the alleged violations described above. I also understood that I was filing this case as an "aggrieved employee" on behalf of myself and my fellow "aggrieved employees" as well as the State of California. I do not believe that I have any conflicts with Aggrieved Employees included in this proposed Settlement and the selected administrator.

6. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to

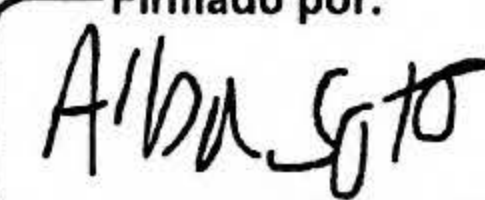
1 search for information online these days, I understood I would face an increased risk that future
2 employers would discover information about this lawsuit online and had a negative reaction to learning
3 that I sued an employer. This may make it harder for me to obtain future employment or change jobs for
4 a better opportunity.

5 7. I believe that the Settlement obtained on behalf of the aggrieved employees and the State
6 of California is fair and reasonable in view of the issues and risks involved with the case. As part of the
7 proposed Settlement, in exchange for a general release payment, I have also agreed to a full release of
8 claims related to my employment with Defendant that extends beyond the release of PAGA claims
9 applicable to other aggrieved employees and beyond wage-and-hour claims.

10
11 I declare under penalty of perjury, under the laws of the State of California, that the foregoing is
12 true and correct.

13
14 Executed 4/23/2026 | 4:42 PM PDT

, at Brawley, California.

15 Firmado por:
16 
FBB1260A6171419...

17 **ALBA SOTO**
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PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 535 N Brand Blvd., Suite 285, Glendale, CA 91203. On April 24, 2026, I served the foregoing document described as:

On the date indicated below, I served the document described as: **DECLARATION OF ALBA SOTO IN SUPPORT OF PLAINTIFF'S MOTION FOR AN ORDER APPROVING SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE PRIVATE ATTORNEY GENERAL'S ACT OF 2004** on the interested parties in this action by sending a true copy thereof to interested parties as follows and as stated on the attached service list:

Anne E. Dwyer
adwyer@swlaw.com
Shaun Rippe
srippe@swlaw.com
Dayanne Garcia
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Telephone: 714-427-7000
Facsimile: 714-427-7799
Attorneys for Defendant STINE
ENTERPRISES INC.

[✓] **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

[✓] **BY ELECTRONIC SERVICE:** Based on a court order, Rule of Court, or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via electronic mail. I did not receive an error message.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 24, 2026, at Los Angeles, California.

Natalia Zevallos

Name

Signature