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SHASTA COUNTY SUPERIOR COURT
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Attorneys for Plaintiff RAMON ESTRADA,
on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SHASTA

RAMON ESTRADA, on behalf of
himself and all others similarly situated,

Plaintiffs,

v.

URBAN RETREAT, INC., a California
corporation; and DOES 1 to 10, inclusive,

Defendants.

CLASS ACTION

Case No.: 23CV-0201662

**DECLARATION OF VANESSA M.
RUGGLES IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Preliminary Approval Hearing:

Date: January 8, 2024

Time: 8:30 a.m.

Dept: 8

Honorable Benjamin L. Hanna
Department 8

Action filed: February 28, 2023

Trial Date: January 30, 2024

DECLARATION OF VANESSA M. RUGGLES IN SUPPORT OF PLAINTIFF'S

MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA

SETTLEMENT

I, Vanessa M. Ruggles, declare:

1. I am an attorney in good standing duly admitted to the State Bar of California and
an attorney of record for Plaintiff Ramon Estrada in this action. I have firsthand knowledge of the
facts set forth in this declaration and, if called to do so, could testify competently to them. This
Declaration is submitted in support of Plaintiff's Motion for Preliminary Approval of Class

1 Action and PAGA Settlement.

2 2. I am admitted to practice law in the state of California. I completed my
3 undergraduate studies at University of Nebraska – Lincoln with a Bachelor of Arts degree in
4 French with minors in Political Science and Sociology in August of 2000. I completed my legal
5 studies at California Western School of Law in San Diego, California, where I received a Juris
6 Doctor degree, magna cum laude, with a concentration in Labor and Employment Law, with
7 honors, in April 2007. I first gained experience in employment law during law school, when I
8 interned at the Employee Rights Center and clerked for over two years at an employment law
9 boutique firm. I also externed for the Hon. Alex C. McDonald at the Court of Appeal, Fourth
10 District, Division One.

11 3. Since being admitted to the California State Bar in December 2007, I have
12 practiced employment law almost exclusively. In the last several years, I have worked mostly in
13 wage and hour litigation. Attorneys across California routinely seek my help with complicated
14 wage claims and complex litigation. I have performed significant behind-the-scenes substantive
15 and strategic work on over one hundred wage and hour class and/or PAGA actions. I have been
16 approved as class counsel in the following class actions: *Osuna v. Vintage Associates,*
17 *Inc.*(Riverside Sup. Ct.) CVRI2200103; *Santillan v. Verizon Connect, Inc.* (S.D. Cal.) 3:21-cv-
18 1257-H-KSC; *ClubCorp Wage and Hour Cases* (O.C. Sup. Ct.) JCCP 5138; *Alvarez v. Bershtel*
19 *(L.A. Sup. Ct.)* 19STCV01129; *Mier v. Mainfreight, Inc.* (L.A. Sup. Ct.) 19STCV04465; *Santoya*
20 *v. Fasttrak Foods LLC* (Riverside Sup. Ct.) PSC1707227.

21 4. Each of the cases listed in the above paragraph involve wage and hour issues
22 similar to the legal and factual issues involved in this case.

23 5. The firm representing the Class has a great deal of experience in wage and hour
24 class action litigation and has been approved as class counsel in numerous other wage and hour
25 class actions. Based on the documents and information provided by Defendant, and our own
26 independent investigation and evaluation, Class Counsel and Plaintiff are of the opinion that the
27 Settlement with Defendant for the consideration and on the terms set forth in this Settlement is
28 fair, reasonable, and adequate, and is in the best interest of the Class Members in light of all

1 known facts and circumstances, including the risk of significant delay and uncertainty associated
2 with litigation, various defenses asserted by Defendant, and numerous potential appellate issues.

3 I declare under penalty of perjury under the laws of the State of California and the United
4 States of America that the foregoing is true and correct.

5 Executed on December 13, 2023, at Los Angeles, California.

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VANESSA M. RUGGLES