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

MICHAEL PAUL SHERIDAN, individually,
on behalf of all others similarly situated, and on
behalf of the State of California and other
aggrieved persons,

Plaintiff,

v.

HEITZ CELLAR LLC, a California limited
liability company; LAWRENCE WINE
ESTATES LLC, a California limited liability
company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23CV000136

*[Assigned for all purposes to the Hon. Joseph
Solga, Dept. B]*

**DECLARATION OF PLAINTIFF
MICHAEL PAUL SHERIDAN IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Complaint filed: January 30, 2023
FAC filed: April 21, 2023
Trial date: Not Set

DECLARATION OF MICHAEL PAUL SHERIDAN

I, Michael Paul Sheridan, declare as follows:

1. I am over 18 years of age and a resident of the State of California. All matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief, and I believe those to be true. If called as a witness in this action, I could and would testify truthfully to the matters described here.

2. I make this declaration by choice. I have not been promised any benefit for doing so, and I have not been pressured into making it. Before signing this declaration, I was given the opportunity to review it, make changes, and verify its accuracy.

3. This declaration is filed in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

4. I am a former employee of Heitz Cellar LLC and Lawrence Wine Estates LLC ("Defendants"). I worked for Defendants from approximately June 2022 to November 2022 as an hourly-paid, non-exempt employee. Throughout my employment, I was subject to all Defendants' policies and practices that have been alleged as unlawful in the class action complaint.

5. I initiated this lawsuit because I was concerned that Defendants failed to pay me correctly for all the hours that I worked, and I was not provided all of my meal and rest breaks.

6. I wanted Defendants to change their policies and improve employees' working conditions. I understand that it is my duty as a potential class representative to put the best interests of the class above my own, personal interests and that I have a responsibility to understand the claims, keep updated about the progress of the lawsuit, and assist my attorneys.

7. I have invested a lot of personal time and energy in this lawsuit. As detailed below, I have spent approximately 50 hours on this case. I chose to be involved because I wanted to get the best result possible for employees.

8. Since I decided to pursue claims, I have spent hours communicating with my attorneys and their office to get updates about the case and provide information about my experience with Defendants. For example, my attorneys and I were able to identify instances when I was not paid correctly by reviewing my records based on my recollection of events. In addition,

before the mediation on July 1, 2025, I had multiple lengthy phone calls with my attorneys regarding the claims at issue, what to expect at the mediation, and how the case might be resolved.

9. I have also spent time looking for documents relevant to my employment with Defendants for my attorneys to review and assess. I spent hours searching for documents, including when I first contacted my attorneys, before my attorneys filed the case, and before the mediation. I also spent time reviewing legal documents in this case, including the retainer and settlement agreements, and discussed them with my attorneys.

10. On the day of mediation, I made myself available and remained in contact with my attorneys to assist with any questions that Defendants or the Mediator might have.

11. I am glad, and relieved, that I was able to represent the class in this lawsuit and recover money for them through this settlement, in addition to letting Defendants know that their policies and practices have to change. I believe that this settlement is fair, adequate, and reasonable, as my attorneys have explained the standard to me, and a good result for employees. I respectfully ask the Court to approve it.

12. I did not make the decision to file a class action lightly. I was concerned that a publicly available lawsuit, especially a class action, might bring me unwanted attention because prospective employers could find out that I sued Defendants after being employed by them. However, I felt that my claims were important because Defendants' conduct hurts everyone, and that conduct should change.

13. I also understand that there was financial risk in bringing this lawsuit. For example, I knew that if I did not prevail in this lawsuit, I could potentially be responsible for Defendants' attorneys' fees and costs.

14. The settlement agreement provides for a service award to me of up to \$10,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute the claims, and for accepting the risks associated with being a named plaintiff in a class action lawsuit. In addition, I willingly agreed to a general release, which I understand is much broader than the release that covers other class members.

15. I believe my involvement in this case resulted in the benefits provided to other

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employees of Defendants, including those who were vulnerable or too afraid to say anything because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was willing to accept that risk on their behalf, as well as my own.

16. I reviewed the Class Action Settlement Agreement in full, and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendants' defenses.

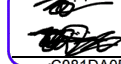
17. I am not aware of any conflict of interest with any class member or Apex Class Action Administration, the settlement administrator.

18. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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

Executed on 7/29/2026, at Sebastopol, California.

Signed by:



Michael Paul Sheridan