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Attorneys for Plaintiff ZAKERY FERNANDEZ,
as an individual and on behalf of all employees
similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

ZAKERY FERNANDEZ, as an individual
and on behalf of all employees similarly
situated,

Plaintiff,

v.

RONBOW CORPORATION, a California
Corporation; DOES 1 through 50, inclusive,

Defendants.

Case No.: 25CV140345

[Assigned for all purposes to Hon. Rebekah
Evenson, Dept. 24]

**DECLARATION OF ZAKERY
FERNANDEZ IN SUPPORT OF
PLAINTIFF’S MOTION FOR AN ORDER
APPROVING SETTLEMENT OF CLAIMS
BROUGHT PURSUANT TO THE PRIVATE
ATTORNEY GENERAL’S ACT OF 2004**

Reservation N: 170087332212
Date: July 23, 2026
Time: 9:00 a.m.
Courtroom: Dept. 24
Judge: Hon. Rebekah Evenson

Action Filed: September 2, 2025
Trial Date: Not Set

DECLARATION OF ZAKERY FERNANDEZ

I, ZAKERY FERNANDEZ, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter against Defendant RONBOW CORPORATION (“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 16, 2025 to August 27, 2025.

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

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 5/15/2026 | 9:05 AM PDT , at San Rafael, California.

15 Signed by:
16 
17 AF6A1677856C48D
18 **ZAKERY FERNANDEZ**
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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action; my business address is 535 N Brand Blvd. Suite 285, Glendale,
7 California 91203.

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

13 Deborah F. Birndorf
14 debbie.birndorf@nortonrosefulbright.com
15 Alia L. Chaib
16 alia.chaib@nortonrosefulbright.com
17 Natalie M. Lagunas
18 natalie.lagunas@nortonrosefulbright.com
19 Diana Cardenas
20 diana.cardenas@nortonrosefulbright.com
21 Kristi Goettling
22 kristi.goettling@nortonrosefulbright.com
23 **NORTON ROSE FULBRIGHT US LLP**
24 555 South Flower Street
25 Forty- First Floor
26 Los Angeles, California 90071
27 Telephone: (213) 892-9200
28 Facsimile: (213) 892-9494

18 ***Attorneys for Defendant RONBOW CORPORATION***

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

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

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

27 Executed on May 20, 2026, at Glendale, California.

28 Natalia Zevallos
Name


Signature