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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ARIEL DIAZ, individually, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

REGAL CINEMAS, INC., a Tennessee
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 25STCV38124

Honorable Richard S. Kemalyan
Department 61

CLASS ACTION

**DECLARATION OF ARIEL DIAZ IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Reservation ID: 605427340953
Hearing Date: June 16, 2026
Hearing Time: 9:00 a.m.
Department: 61

Complaint Filed: December 29, 2025
FAC Filed:
Trial Date: None Set

DECLARATION OF ARIEL DIAZ

I, Ariel Diaz, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case, as well as the putative class action case currently pending in the United States District Court for the Central District of California, entitled *Ariel Diaz v. Regal Cinemas, Inc.*, case No. 2:26-cv-03107, which was originally filed on the Superior Court of the State of California for the County of Los Angeles and assigned as case number 25STCV38428 (the “Class Action”). 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 Regal Cinemas, Inc. (“Defendant”) from approximately April 2023 to approximately September 2025 as an hourly-paid, non-exempt 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”), and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the cases, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff and 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 as a class representative.

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

1 routinely checked in with my attorneys and their staff to make sure that they had all of my most
2 current information and any additional information that I had obtained.

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

9 5. As far as the settlement is concerned, I was available to consult with my attorneys
10 regarding settlement negotiations and mediation, and to review documents and answer any
11 questions my attorneys had. I reviewed and considered, among other things, the Settlement
12 Agreement and discussed the questions I had regarding the potential settlement with my attorneys
13 before signing the settlement papers.

14 6. I think my efforts helped to get the result obtained in the cases, and as a potential
15 class and PAGA representative, I respectfully request that the Court award me an enhancement
16 award for my efforts in pursuing and participating in the cases, as well as my broader release of
17 claims. Taking into consideration the time that I have dedicated to the cases, I believe that this
18 amount is reasonable.

19 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

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

Executed on this _____ day of _____ 2026, at Los Angeles, California.

Ariel Diaz