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Attorneys for Plaintiff DARLYN CORTEZ VASQUEZ, individually, and on behalf of other similarly situated employees and aggrieved employees pursuant to the California Private Attorneys General Act

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

DARLYN CORTEZ VASQUEZ, individually, and on behalf of other similarly situated employees and aggrieved employees pursuant to the California Private Attorneys General Act,

Plaintiff,

vs.

LULU'S AT TOWN & COUNTRY VILLAGE INC.; LULU'S ON LAUREL INC.; LULU'S ON THE ALAMEDA INC.; LULU'S ON MAIN STREET, INC.; LULU'S AT THE PRUNEYARD, INC.; and DOES 5 through 25, inclusive,

Defendants.

Case No.: 25CV478109

Honorable Beth McGowen
Department 22

DECLARATION OF PLAINTIFF DARLYN CORTEZ VASQUEZ IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Confirmation Code:	GVJSASSZ
Date:	July 8, 2027
Time:	1:30 p.m.
Dept:	22
Complaint Filed:	October 20, 2025
FAC Filed:	September 8, 2026
Trial Date:	Not Set

DECLARATION OF DARLYN CORTEZ VASQUEZ

I, Darlyn Cortez Vasquez, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-captioned case. 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 Defendants LuLu's at Town & Country Village Inc., LuLu's on Laurel Inc., LuLu's on the Alameda Inc., LuLu's on Main Street, Inc., and LuLu's at the Pruneyard, Inc. (collectively, "Defendants") as an hourly-paid, non-exempt Cashier from approximately October 2023 to approximately December 2024.

3. Because I thought the practices at Defendants may not be lawful, I decided to seek legal advice about my work experiences at Defendants and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendants were held accountable for not properly compensating their employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with Defendants, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Defendants.

5. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained. I made myself available to answer any questions my attorneys had about Defendants' practices and treatment of their employees whenever they needed me. I responded to them as quickly as possible and gave them as

much information as I could.

6. I understood that in the event this matter did not settle and proceeded with trial, I would need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any responsibilities that are necessary for this lawsuit.

7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also understood there was a risk of losing any job and/or income due to the time that I would have to spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In contrast, the other employees who will be receiving money from this lawsuit did not have to file a claim or take the risk that I took in bringing this action.

8. I reviewed the settlement agreement, discussed the settlement agreement with my attorneys, and asked them questions before signing it.

9. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California. I have spent approximately 45-50 hours participating in this case as described above. I believe my efforts helped get the result obtained in this case.

10. I understand that any resolution of this lawsuit on a class wide basis is subject to court approval, and any settlement must be designed in the best interest of the Class as a whole. At all times throughout the course of this litigation I have considered the interests of the Class and put them before my own personal interests.

11. I understand that incentive or enhancement awards are discretionary and intended to compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA action, and an acknowledgment of the benefits resulting from the representative's actions. I believe my work in this matter is meritorious on these points for the reasons set forth above.

12. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of $10,000.00 for my efforts and active participation in the case and for the broader, general release of all claims that I have or may have against Defendants in connection with the

settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

13. I am not related to anyone associated with Blackstone Law, APC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 11/03/2026, at East Palo Alto, California.

Darlyn Cortez Vasquez