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and Proposed Class Counsel

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

CONNIE ESPARZA, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

RITZ FMS, INC., a California corporation,
and DOES 1 through 10, inclusive,

Defendants.

CASE NO: ECU004828

Assigned to Hon. L. Brooks Anderholt, Dept. 9

**DECLARATION OF CONNIE ESPARZA IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: October 29, 2026

Time: 8:30 a.m.

Dept.: 9

Complaint Filed: July 8, 2026

I, CONNIE ESPARZA, hereby declare and state as follows:

1. I am the named Plaintiff in this lawsuit against Defendant RITZ FMS, INC. ("Defendant") and I submit this declaration in support of Plaintiff's Unopposed Motion for Preliminary Approval of Class and Representative Action Settlement. I am a competent adult and worked for Defendant as a non-exempt employee during the relevant time period. I have personal knowledge of the facts set forth herein, and if called as a witness to testify to them, I could and would do so competently.

2. I contacted my current attorney when I questioned the employment practices of Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class Representative in a class action on behalf of other employees of Defendant who I believed were being subjected to labor law violations in addition to asserting individual wage, hour, and termination-related claims.

3. Specifically, I questioned Defendant's policies and practices regarding meal and rest periods, the timely payment of wages during employment and upon separation of employment, the reimbursement of business expenses such as the use of my personal cell phone, and the accuracy of the wage statements it issued to its employees. Through many discussions with my lawyer, I learned these may be illegal practices and Defendant's employees might have recourse for them.

4. During my employment, I was frequently too busy to take my rest periods and meal periods. When I was able to take them, they were often late, cut short, or interrupted by work. I was not paid an additional hour of pay when this happened. Based on my own observations and conversations with coworkers, I believe other non-exempt employees of Defendant experienced the same thing.

5. By bringing this lawsuit, and throughout its course, I have put the interests of the class ahead of my own. I always knew that I could be responsible for paying Defendant's attorneys' fees and costs if this case did not resolve favorably. My goal in bringing this lawsuit was to obtain a recovery on behalf of myself and the class, and even more

importantly, to put an end to what I believed were illegal practices on the part of Defendant. I believe this settlement achieves a fair recovery for the class.

6. I am very happy about the results of this litigation. I am satisfied that Defendant is compensating class members for wages, penalties, and interest that I believe we are due.

7. At the outset of this case, I spent time through numerous phone calls with my attorney explaining what I understood to be the policies and procedures of Defendant and how they were applied to me and others I worked with. During the course of this litigation, up through and following the settlement process, I kept actively involved with its status, tracking the status of the case and participating as much as possible.

8. While I have not maintained detailed time records of my activities in connection with this litigation, I believe that I have spent and will spend a total of approximately 20 hours assisting my attorney with the preparation of this case, and doing work and analysis independent from my attorney both before and during this case, including conducting an independent investigation of the facts.

9. Before this litigation commenced, and throughout its course, I have spent approximately 12 or more hours gathering, organizing, and reviewing documents and information for this lawsuit. I sifted through many of my own documents and reviewed information produced by Defendant as part of this case.

10. I have communicated with my attorney each month to track my case's status. I have taken an active involvement in this matter throughout its course.

11. This lawsuit will almost certainly result in reputational harm to me. There is a stigma associated with suing anyone, let alone your former employer. I will probably be adversely affected when it comes to obtaining future employment—employers who learn that I sued Defendant in a class action will likely avoid hiring me.

12. I do not believe that I have any conflicts with other members of the class. My interests in bringing this lawsuit—to recover compensation for current and former employees affected by Defendant's practices—are the same as those of all other class members.

13. I also have a separate individual settlement with Defendant to settle my individual claims, including claims related to wrongful termination. That agreement is confidential. It is funded separately by Defendant and does not reduce the amount of money available to the class under the class settlement. It compensates me only for releasing my own individual claims, which class members are not being asked to release. The terms of the class settlement were agreed upon before my individual claims were negotiated.

14. I am not seeking a service award or enhancement payment of any kind from the class settlement. I understand that my individual settlement agreement can be provided to the Court for private review if the Court wishes to see it.

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

Executed on 09 / 28 / 2026 at Riverside, California.

Connie Esparza

CONNIE ESPARZA