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

FERNANDO ALBERTO ACEVEDO,
ANTHONY GUZMAN, FERNANDO
HIPOLITO, and VANESSA OLMOS-CORTES,
individually, on behalf of all others similarly
situated, and on behalf of the State of California
and other aggrieved persons,

Plaintiffs,

v.

CROCS RETAIL, LLC, a limited liability
company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23STCV15354

CLASS & REPRESENTATIVE ACTION

[Assigned to: Hon. Elihu M. Berle, Dept. 6]

**DECLARATION OF PLAINTIFF
ANTHONY GUZMAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF ANTHONY GUZMAN

I, Anthony Guzman, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Crocs Retail, LLC (“Defendant” or “Crocs”). I worked for Defendant from approximately January 2023 to approximately March 2023 as an hourly-paid, non-exempt employee.

4. During the time I was employed with Crocs, I was subject to all of Defendant’s policies and practices that have been alleged as unlawful in the First Amended Class & Representative Action Complaint and Private Attorneys General Act (“PAGA”) Notice sent to Defendant and the Labor & Workforce Development Agency.

5. The reason why I decided to join this lawsuit against Crocs was because I was not being paid properly for all the hours that I worked. Further, I felt I was not provided all of my meal breaks and rest periods.

6. I understood that it was my duty as a class representative to represent the best interests of the entirety of the class, understand what the lawsuit was about exactly, and assist my attorneys with any information they needed to help prosecute this case.

7. By joining this lawsuit as one of the class representatives, I hoped that I might be able to change Defendant’s policies to improve the working conditions of my co-workers.

8. Participating in this lawsuit as a named class representative required me to spend a lot of my own time helping move the needle forward as it related to the prosecution of this matter. As detailed below, I have spent approximately 35 hours on this case.

9. Throughout this case, I had numerous phone conversations with my attorneys to stay updated on the case and share relevant information. For instance, during some of these calls, we identified specific instances where I had not been paid correctly. Additionally, in preparation for the mediation in May 2024, I engaged in several lengthy discussions with Wilshire Law Firm about the claims involved and the mediation process.

10. During the course of the case, I devoted significant time to locating and providing relevant documents to my attorneys. This process required numerous hours, including when I initially contacted my attorneys and in the lead-up to mediation. I also reviewed legal documents, such as the retainer and settlement agreement, and engaged in detailed discussions with my attorneys about their terms.

11. I also made myself available on the day of mediation and was in constant contact with my attorneys so I could assist them with any questions or issues that they may have had.

12. I would recommend that the Court approve this settlement because I believe that the settlement amount, as well as its terms, is fair, adequate, and reasonable. I am grateful for the opportunity to represent the class in this lawsuit and to help secure a settlement that provided financial recovery for the class.

13. I did not arrive at the decision to join this class action without careful thought. I understood that a public lawsuit—especially a class action—would draw attention, and that my name would be linked to legal action against my former employer. I also recognized the risk that future employers might learn I had sued Defendant. Still, I believed vital rights were being undermined in a way that affected everyone, and I felt compelled to act.

14. 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 that I could potentially be responsible for Defendant's attorneys' fees and costs.

15. I understand that under this settlement agreement, I may receive a service payment of up to \$7,500. I believe this sum fairly compensates me for the time and effort I committed to prosecuting this case, as well as the potential impact on my future employment. I also acknowledge that I have signed a general release, which is broader than the release binding other class members.

Beyond what is specified in the settlement, I am not receiving any additional compensation or benefits.

16. Drawing on my involvement in this case and the resulting benefits for my former co-workers, I'm proud to have stood up for those who felt too intimidated to speak out for fear of losing their jobs or being labeled as troublemakers for suing their employer. I was willing to face those risks because I genuinely care about protecting the interests of my former colleagues.

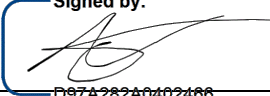
17. I reviewed and signed the Class and PAGA Settlement Agreement in full and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendant's defenses.

18. I have no conflicts of interest with any class member or the Settlement Administrator, CPT Group, Inc.

19. 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 12/23/2024, at Los Angeles, California.

Signed by:

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 Anthony Guzman

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1 PROOF OF SERVICE