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Attorneys for Plaintiff
ALEXANDRIA EATON

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

ALEXANDRIA EATON and REBECCA
WAKEMAN, as aggrieved employees
pursuant to the Labor Code Private
Attorneys Act of 2004 ("PAGA"), on
behalf of the State of California and other
aggrieved employees,

Plaintiffs,

v.

THE GAP, INC., GPS CONSUMER
DIRECT, INC., and DOES 2 through 10
inclusive,

Defendants.

ALEXANDRIA EATON, on behalf of
herself and on behalf of all persons
similarly situated,

Plaintiff,

v.

THE GAP, INC., GPS CONSUMER
DIRECT, INC. and DOES 1 to 10,

Defendants.

Related Cases:

CASE NO. RG21104093

CASE NO. 23CV045852

**DECLARATION OF MARITA M.
LAUINGER IN SUPPORT OF
CONTINUED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

DATE: January 21, 2025

TIME: 1:30 p.m.

DEPT: 21

Assigned for All Purposes to:
Hon. Somnath Raj Chatterjee

1 I, Marita M. Lauinger, declare:

2 1. I am an attorney licensed to practice in the State of California and before this
3 court and am a partner in Clapp & Lauinger LLP, attorneys of record for Alexandria Eaton,
4 Lucy Im, and Erika-Justine Tili. I have personal knowledge of the following facts and if
5 called upon as a witness would testify as follows:

6 2. In accordance with the Court's Order dated December 3, 2024 continuing
7 Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, the
8 Parties herein prepared and executed an Amended Joint Stipulation of Class and PAGA
9 Action Settlement to address the Court's concerns regarding Issue #2 - Release of LWDA's
10 Claims By Plaintiff Under PAGA and Issue #3 - Release of LWDA's Claims By Aggrieved
11 Employees/Class Members.

12 3. Attached hereto as Exhibit 1 is a true and correct copy of the Amended Joint
13 Stipulation of Class and PAGA Action Settlement. The Parties amended Section V (page 16)
14 entitled "Releases of Claims"; subsection 5.2.2 (page 18) entitled "*Eaton I* PAGA Release by
15 Plaintiff and State of California"; and subsection 5.2.4 (page 19) entitled "*Eaton II* PAGA
16 Release by PAGA Representatives and the State of California".

17 4. Plaintiff's counsel has submitted the Amended Joint Stipulation of Class and
18 PAGA Action Settlement to the California Labor and Workforce Development Agency
19 (LWDA).

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct. Executed on January 14, 2025, at San Diego, California.

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24 MARITA M. LAUINGER
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