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Attorneys for Plaintiff JESSE ROMERO, individually,
on behalf of others similarly situated, and on behalf of
Aggrieved Employees pursuant to the
California Private Attorneys General Act

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

JESSE ROMERO, individually and on behalf
of others similarly situated,

Plaintiff,

vs.

CALIFORNIA CLOSET COMPANY, a
California corporation; CAL CLOSET
RETAIL, INC., a Delaware corporation; and
DOES 1 through 25, inclusive,

Defendants.

Case No.: 23STCV27355

The Hon. Samantha Jessner, Department 7

**DECLARATION OF PLAINTIFF JESSE
ROMERO IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS,
ENHANCEMENT PAYMENT, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: June 5, 2025

Time: 10:00 a.m.

Dept.: 7

Complaint Filed: November 7, 2023

FAC Filed: October 10, 2024

Trial Date: None Set

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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.

3. Because I thought Defendants practices may not be lawful, I decided to pursue a lawsuit against the company. 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 consulted with the attorneys at Blackstone Law 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.

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 its employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.

1 6. I understood that in the event this matter did not settle and proceeded to trial, I would
2 need to respond to formal discovery, attend a deposition, and be in court to participate in the trial. I
3 was ready to perform that role, as well as fulfill any other responsibilities necessary for this lawsuit.

4 7. I took a considerable risk by bringing and pursuing this lawsuit for several reasons.
5 First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also
6 understood there was a risk of losing any current job and/or income due to the time that I would have
7 to spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed.
8 Most importantly, I believe that by pursuing this case, I have taken a significant risk because future
9 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
10 to find employment within this industry – and even outside of it – in the future. In contrast, the other
11 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
12 that I took in bringing this action.

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

15 9. I believe that I have done everything that my attorneys have asked of me and tried, to
16 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
17 In total, I have spent approximately 35 hours participating in this case as described above. I believe
18 my efforts helped get the result obtained in this case.

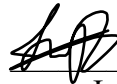
19 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
20 approval, and any settlement must be in the best interest of the Class as a whole. At all times
21 throughout the course of this litigation I have considered the interests of the Class and put them before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

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

28 12. I respectfully request that the Court approve the Settlement and an Enhancement

1 Payment in the amount of \$7,500.00 for my efforts and active participation in the case and for the
2 broader, general release of all claims that I have or may have against California Closet Company and
3 Cal Closet Retail, Inc., in connection with the settlement. Taking into consideration the time that I
4 dedicated to this case and favorable terms of the settlement, I believe that this amount is reasonable.

5
6 I declare under penalty of perjury under the laws of the State of California that the foregoing
7 is true and correct. Executed on 12/09/2024, at Bellflower, California.

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9 

10 _____
Jesse Romero