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Attorneys for Plaintiff,

MARGARITA SOTELO, and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

(UNLIMITED JURISDICTION)

MARGARITA SOTELO, as an “aggrieved employee” on behalf of herself and other similarly situated “aggrieved employees” under the Labor Code Private Attorneys General Act of 2004,

Plaintiff,

vs.

LA REINA MARKETS, LLC; and DOES 1 to 25, inclusive,

Defendants.

Case No.: 30-2024-01373350-CU-OE-CXC

DECLARATION OF MARGARITA SOTELO IN SUPPORT OF PLAINTIFF’S MOTION FOR APPROVAL OF PAGA SETTLEMENT

*Assigned for All Purposes to
Hon. Melissa R. McCormick, Dept. CX104*

Action filed: 01/16/2024

Hearing Date: 08/14/2025

Hearing Time: 2:00 p.m.

Hearing Dept: CX104

Reservation Number: 74528898

DECLARATION OF MARGARITA SOTELO IN SUPPORT OF
PAGA SETTLEMENT AND RELEASE

I, MARGARITA SOTELO, declare and state as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Maralle Messrelan of MM Law, APC in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I first started working for Defendant LA REINA MARKETS, LLC (“Defendant” or “LA REINA”) in or around April 2022 in the bakery department of its grocery store located at 508 N. East St. in Anaheim, California. My employment with Defendant ended on or around February 1, 2023.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that Defendant LA REINA is the Defendant. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other LA REINA employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not paid for all hours worked at the correct rates of pay, provided all required meal and rest periods, and reimbursed for necessary business expenses, such as uniforms and personal mobile phones for work purposes. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don’t have any disagreements with the other LA REINA employees I represent. I am not aware of any reason why I can’t make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing LA REINA. I agreed that I would do what is in the best interest of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

5. The PAGA statute does not forbid service awards. Courts frequently award them in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys,

1 speaking with my attorneys on many occasions by phone, explaining what my employment at
2 LA REINA was like, explaining what my employment at LA REINA had in common with other
3 employees who worked for LA REINA, explaining my claims to my attorneys, participating in
4 mediation, and communicating with my attorneys about the settlement agreement and related
5 documents. Despite this, I am not asking for a service award for my involvement and the time I
6 spent assisting my counsel with the PAGA action.

7 6. I negotiated an individual settlement of my claims under the Fair Employment
8 and Housing Act ("FEHA") for disability discrimination, failure to accommodate disability,
9 failure to engage in the interactive process, failure to prevent disability discrimination and
10 wrongful termination in violation of public policy in addition to the settlement of the PAGA
11 action.

12 7. As part of my individual settlement, I signed a general release of all claims,
13 whether known or unknown, that I may have against Defendants, not only PAGA claims.

14 8. I don't believe that my individual settlement has any bearing on whether I have
15 served the Aggrieved Employees' best interests and will continue to do so.

16 I declare under the penalty of perjury of the laws of the State of California that the
17 foregoing is true and correct to the best of my knowledge.

18 Executed on March 5, 2025 at Anaheim, California.

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20 Margarita Sotelo (Mar 5, 2025 12:37 PST)

21 MARGARITA SOTELO,
22 Declarant
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