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Attorneys for Plaintiff

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

AUDIE MUNOZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

RALPHS GROCERY COMPANY, an Ohio
Corporation; and DOES 1 through 100,

Defendants.

Case No. 23STCV28212

*[Assigned for all purposes to the Hon.
Laura A. Seigle, Dept. SSC-17]*

**DECLARATION OF PLAINTIFF AUDIE
MUNOZ IN SUPPORT OF APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: June 11, 2026

Time: 9:00 a.m.

Dept.: SSC-17

Action Filed: November 16, 2023

Trial Date: None Set

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I, Audie Munoz, declare as follows:

1. I am an individual over the age of 18 and am the named plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant Ralphs Grocery Company (“Defendant”) since approximately June 2013, and I recently retired in 2026. I was employed as a non-exempt employee in the position of “Truck Driver.” During my employment with Defendant, I was subject to Defendant’s wage and hour policies and practices at issue in this action.

3. While I was employed with Defendant, I recorded my hours worked through an electronic timekeeping system. Even though I accurately recorded my actual hours worked, during at least a portion of my employment, it is my understanding that Defendant's timekeeping system rounded my time entries to the tenth of an hour. This led to me not being compensated for all the hours I worked. As a result of these unpaid wages, it is my understanding that Defendant did not issue accurate wage statements.

4. I have been actively involved in this case since I first retained Haines Law Group, APC (“HLG”) in October 2023. Without waiving the attorney-client privilege, I have had many discussions with the attorneys and staff at HLG, including discussions regarding Defendant’s wage and hour policies and my claims in this case, litigation strategy, potential witnesses, updates on how the case was proceeding, and how I could help the case and the potential Class Members. I also provided information and documents to my attorneys to assist them in mediation and negotiating the Settlement. I also responded to formal discovery requests served by Defendant and produced documents in response to those requests. I made myself available during the mediation in this matter in June 2025. I also spent time reviewing and discussing the Settlement Agreement as well as other documents from my attorneys, and reviewing my own records for documents that would be potentially relevant to the case. In total, I estimate that I have spent approximately 50-55 hours in connection with this case since I first retained HLG in 2023.

5. When I retained HLG and decided to pursue this case, I understood it could benefit former and current employees of Defendant by helping to recover unpaid wages and other penalties on their behalf. I also knew there was a risk I could be liable for Defendant's costs if we lost the case. I also understood that filing a lawsuit is a public record. However, I accepted those risks because I wanted Defendant to pay its current and former employees properly. As far as I am aware, I have no actual or potential conflicts with any of the Class Members.

6. As part of the proposed Settlement, and in exchange for my requested service payment, I have also agreed to a full release of claims related to my employment with Defendant that extends beyond the release of claims applicable to other Class Members.

7. I understand that my attorneys will request that the Court approve a service payment of \$7,500 for my efforts on behalf of the Class Members, as well as my full release of claims. I believe this amount is reasonable based on the amount of time and effort I have devoted to this case, the amount of time that has passed since my lawsuit was first filed in November 2023, as well as the risks I have undertaken as a class representative, as described above. This proposed service payment is not contingent upon me supporting the proposed 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 May 14, 2026, at West Covina, California.

Audie Munoz (May 15, 2026 09:44:03 PDT)

Audie Munoz