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Attorneys for Plaintiff,
YULIANNY QUERALEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

YULIANNY QUERALEZ, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

NEWAGE GLENDALE, LLC, a limited liability
company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23STCV27699

*[Assigned to the Hon. William F. Highberger,
Dept. 10]*

REPRESENTATIVE ACTION

**DECLARATION OF YULIANNY
QUERALEZ RIVERA IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

Date: March 16, 2026
Time: 1:30 a.m.
Courtroom: Dept. 10
Judge: Hon. William F. Highberger

Action Filed: November 9, 2023
Trial Date: Not Set

DECLARATION OF YULIANNY QUERALEZ

I, YULIANNY QUERALEZ, declare as follows:

1. I am a named Plaintiff in this case. I am a former employee of the named defendant, NEWAGE GLENDALE, LLC ("Defendant"). As such, I have personal knowledge of, or am informed and believe, the following facts herein stated. I could and would competently testify if called as a witness.

2. I worked for Defendant in the County of Los Angeles, State of California, as a Room Attendant during the statutory period. I held a job position that is at issue in this case.

3. I was an hourly non-exempt employee of Defendant and was subject to the same pay structure and rules as all the other hourly non-exempt employees of Defendant.

4. I have conferred with my attorneys about the settlement proposed in this case. I am not an accountant, but I understand the factors and risks that need to be considered when evaluating a settlement.

5. I believe that were it not for my stepping forward and taking on the duties of protecting the interests of other employees that worked for Defendant, it is likely that the interests of the group would neither have been prosecuted, nor benefited.

6. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to search for information online these days, I will face an increased risk that future employers will discover information about this lawsuit online and have a negative reaction to learning that I sued an employer. This may make it harder for me to obtain future employment or change jobs for a better opportunity.

7. I have devoted a substantial amount of my time, both before this lawsuit was filed and also during its litigation to ensure a fair result. This involved ongoing communications and participation with my counsel during the course of this case.

8. My participation began with bringing certain issues that are involved in this matter to my counsel's attention, and explaining the factual background that was used to prosecute the claims in this case.

9. For example, I reviewed documents which I already had, I provided relevant documents to my counsel, and I explained those documents and related facts to my counsel to assist them in their review. I also assisted in identifying potential witnesses, including other employees, who might likewise

have been of assistance.

10. My efforts continued after suit was filed. For example, I continued to identify employees and other witnesses to counsel, along with other information as to how they could be of potential use in this matter. I also discussed strategy with my counsel.

11. I also made myself available to answer any questions that arose during the full day mediation.

12. After the mediation, a long-form settlement agreement was negotiated, and I reviewed it with my attorneys as well as I was able to ensure that its terms are likewise fair and adequate.

13. I believe an enhancement of \$5,000.00 is fair and reasonable for my substantial initiative, significant efforts, and personal risks in supporting this case.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on 8/28/2025, at 8/28/2025, California.

DocuSigned by:


YULIANNY QUERALEZ, "Declarant"