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Attorneys for PLAINTIFF MARIA IBANEZ,
Individually and on behalf of all other Aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY LOS ANGELES – STANLEY MOSK COURTHOUSE

PATRICIA ARELLANO and MARIA IBANEZ,
individually and on behalf of all other Aggrieved
Employees,

Plaintiffs,

vs.

NORTHGATE GONZALEZ MARKET, INC.;
and DOES 1 to 100, inclusive,

Defendants.

Case No.: 24STCV10515

*[Assigned for All Purposes to:
Hon. Rupert A. Byrdsong, Dept. 318]*

**DECLARATION OF MARIA IBANEZ IN
SUPPORT OF PLAINTIFFS’ MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT**

*[Filed concurrently with the Notice of Motion
and Motion for Approval of Private Attorneys
General Act Settlement; Declarations in
Support Thereof; [Proposed] Order]*

DECLARATION OF MARIA IBANEZ

I, MARIA IBANEZ, declare:

1. I am over the age of 18 and am one of the named Plaintiffs and class representatives in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. This declaration is submitted in support of approval of the Private Attorneys General Act settlement in this matter.

3. I worked for Defendant NORTHGATE GONZALEZ MARKET, INC. ("Defendant"), as an hourly, non-exempt employee from in or around August of 2013, until on or about April 19, 2024.

4. From the time of the filing of the lawsuit, I have understood that this is a Private Attorneys General Act lawsuit where I represent the interests of the State of California, and all hourly, non-exempt employees of Defendant who worked for Defendant in California during the PAGA Period.

5. I believe while working for Defendant, I and all hourly, non-exempt employees of Defendant who worked for Defendant in California during the PAGA Period, were subject to the same policies and procedures regarding failure to provide employment records, payment of minimum and overtime wages, meal and rest periods, wages statements, failure to pay reporting time wages, failure to pay split shift wages, failure to timely pay wages, and final payment of wages. I believe that the claims of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the PAGA Period, are identical to mine because Defendant's policies and procedures applied to all of us.

6. I understand that I must continue to consider and protect the interests of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the PAGA Period. I have been protecting the rights of myself and all hourly, non-exempt employees of Defendant who worked for Defendant in California during the PAGA Period, since approximately June of 2024 when first I started looking for an attorney before this lawsuit was filed. I have been

1 and continue to place the interests of all hourly, non-exempt employees of Defendant who worked
2 for Defendant in California during the PAGA Period before my own. I do not have any interests
3 that conflict with those of the other Aggrieved Employees.

4 7. I provided information and made myself available to my attorneys since
5 approximately June of 2024 when I was searching for my attorney. I have helped and been willing
6 to support the lawsuit in any way I can for the last approximately 25 months since June of 2024
7 when I began searching for an attorney for the claims in this lawsuit. I have searched for an
8 attorney, met with my attorneys to see if they would represent me, met with my attorneys to
9 discuss the Defendant's policies, procedures, and practices regarding Defendant's alleged failure
10 to provide employment records, payment of minimum and overtime wages, meal and rest periods,
11 wages statements, failure to pay reporting time wages, failure to pay split shift wages, failure to
12 timely pay wages, and final payment of wages. I spent time searching for policies and procedures
13 that were given to me during my employment, any timecards I had, any pay stubs I had, handbooks
14 and other documents related to my employment. I produced all the documents to my attorneys. I
15 responded to almost all of my attorneys' telephone calls and interviews and I met with them in
16 person and/or telephonically to discuss any questions they had about my employment, Defendant's
17 policies and procedures, and Defendant's payment of wages, providing wage statements,
18 termination of employees, or the documents I had provided to them. I was available during the full
19 day mediation in this case. Once the settlement agreement was finalized, I conferred with my
20 attorneys on multiple occasions to review and discuss the settlement agreement before signing. I
21 would estimate that I have spent between 50-60 hours working on and being available for this
22 case.

23 8. I also understand that in the event this matter proceeds to trial, I must come to court
24 to participate in the trial. I will come to court if I am needed and have been ready to perform any
25 responsibility that is necessary for this lawsuit. I know that I took a risk by filing this lawsuit
26 because if I lost, I would have to pay for all the costs incurred by the Defendant in the lawsuit. I
27 also have the risk of losing income for any time that I would have to spend fulfilling my
28 responsibilities including having to attend the trial. I also believe I have taken a risk by filing this

1 lawsuit because my employers in the future may find out that I sued my employer, and they may
2 not like it. The other employees will be receiving money from this lawsuit, and they have not had
3 to file a lawsuit, look for an attorney, or take the risks that I have had to take.

4 9. I understand that the settlement we have reached in this case must be approved by
5 the Court and I must protect the interests of all hourly, non-exempt aggrieved employees of
6 Defendant who worked for Defendant in California during the PAGA Period.

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

9 Executed this 28th day of July, 2026, in Garden Grove, California.

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13 MARIA IBANEZ
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