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LINARES

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

SHANE GREENE, ALEX FERNANDEZ,
DAVID STANLEY, EDDIE RUSTRIAN,
and JENNY LINARES, individually, and
on behalf of all others similarly situated,

Plaintiffs,

v.

DOLLAR TREE DISTRIBUTION, INC., a
Virginia corporation; and DOES 1 through
10, inclusive,

Defendants.

Case No. CIVSB2420954

*[Assigned for All Purposes to the Nicole
Quintana Winter, Dept. S29]*

**DECLARATION OF ARIANNA JACOBO
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Preliminary Approval Hearing:

Date: September 30, 2026

Time: 9:00 a.m.

Dept.: S29

Action Filed: June 26, 2024

1 I, Arianna Jacobo, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. This declaration is submitted in support of approval of the proposed class action
4 and PAGA settlement (“Settlement”) reached in this case. I have personal knowledge of the facts
5 contained in this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I was employed by Defendant Dollar Tree Distribution, Inc. (“Defendant”) as an
7 hourly-paid, non-exempt employee from approximately March 29, 2023 to approximately January
8 3, 2024 in its distribution warehouse in Stockton, California. During my employment with
9 Defendant, I was subject to Defendant’s wage and hour policies and practices that are at issue in
10 this case.

11 3. Specifically, I received bonuses which I believe were not correctly factored into my
12 overtime and paid sick leave rates of pay; as a result of the underpayment of wages, I believe I
13 received inaccurate wage statements and was not paid all wages when my employment with
14 Defendant ended; I was subject to a strict quota and if I didn’t meet my quota I could potentially get
15 fired; and the warehouse I worked in was very hot during the summer without proper temperature
16 controls by Defendant. I believe other non-exempt employees of Defendant were subject to the
17 same policies and procedures discussed above and that my claims against Defendant for unpaid
18 wages and statutory and civil penalties are typical of Class Members’ claims.

19 4. Without waiving the attorney-client privilege, my attorneys explained my role and
20 responsibilities as a Class Representative, and I understand my responsibilities as a Class
21 Representative. Since retaining my attorneys in February 2024, I have had many discussions and
22 meetings with the attorneys and staff at Justice for Workers, discussions regarding Defendant’s
23 wage and hour practices and my claims in this case, litigation strategy, opposing Defendant’s
24 Motion to Compel Arbitration and preparing to testify at an evidentiary hearing, updates on how the
25 case was proceeding, the Settlement, and how I could help the case and potential Class Members. I
26 also gathered and reviewed documents for use in the lawsuit and reviewed and signed relevant
27 documents with my attorneys, such as my declaration to oppose the Motion to Compel Arbitration
28 and settlement documents. I estimate that I have spent at least 30 hours on this case from the time I

1 first spoke with my attorneys regarding this case until the present. I also understand that as part of
2 the Settlement, I have agreed to a general release of claims against Defendant, which is broader than
3 the release of claims agreed to by other Class Members.

4 5. Furthermore, there is no conflict between my interests and the interests of the class
5 that I am seeking to represent. My interests are entirely coextensive with the interests of the Class. I
6 allege that I was injured by the same company-wide policies and practices to which the proposed
7 Class was subjected and seek the same relief. I have already demonstrated my ability to advocate
8 for the interests of the Class by initiating this litigation, undertaking extensive class discovery, and
9 evaluating the proposed settlement to assure that it is fair.

10 6. I understood that at the time I filed this action, as a Class Representative, I owed a
11 duty to the putative class members to faithfully prosecute this action with their best interests at the
12 forefront of every decision. I understood that I could not make any decision in this action for the
13 sole benefit of my personal interest. I understood that in executing this duty, I might have been
14 asked to sacrifice my personal best interests for the benefit of the interests of the putative class
15 members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the
16 broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful
17 wage and hour practices. I believe that I faithfully executed the duties of a Class Representative
18 throughout this litigation and will continue to do until this litigation is fully and finally resolved.

19 7. I understand that my attorneys will request that the Court approve a service award of
20 \$10,000 for my efforts on behalf of the Class. I believe this amount is reasonable based on the
21 amount of time and effort I have devoted to this case, the risks I have undertaken as a Class
22 Representative and my general release of claims.

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

3 Executed on July 17, 2026 at Lathrop, California.
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Arianna Jacobo
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