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Attorneys for Plaintiffs CATALINA PALACIOS and RUBY RODRIGUEZ and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CATALINA PALACIOS, an individual; RUBY RODRIGUEZ, an individual; on behalf of themselves and all others similarly situated and the general public,

Plaintiffs,

vs.

WOODCRAFT RANGERS, a California corporation; and DOES 1 to 100, inclusive,

Defendants.

Case No. 24STCV16531

[Assigned for All Purposes to:
The Hon. William F. Highberger, Dept. SS10]

DECLARATION OF PLAINTIFF AND CLASS REPRESENTATIVE RUBY RODRIGUEZ IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Date: December 15, 2026
Time: 1:30 PM
Dept: 10

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I, RUBY RODRIGUEZ, declare as follows:

1. I am over the age of eighteen and am a Class Representative Plaintiff in the matter *Palacios et al. v. Woodcraft Rangers.* The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

3. I was previously employed by Defendant from 2021 to 2023 and worked in California as a site coordinator. During my time working for Defendant, I was subjected to the same wage and hour policies and practices that are at issue in this case, including the Defendant's practice of failing to pay employees all wages owed, failing to provide meal periods, failing to authorize and permit rest periods, failing to provide accurate wage statements, and related issues.

4. Since the beginning of this case, I have been closely involved in assisting my attorneys with prosecuting this action and have done so diligently and aggressively since I filed the Complaint in 2024. Prior to getting involved in this case, I spoke with my attorneys for many hours to understand the nature of the case and shared with my attorneys the wage and hour violations that I experienced at Defendant. Before becoming involved in the case, I also spent several hours acquainting myself with my duties and obligations as a class action representative, and my role in prosecuting this case against Defendant.

5. After I became involved in this case, I assisted my attorneys in reviewing and understanding the documents exchanged in discovery. I reviewed many of Defendant's payroll records and policy documents with my attorneys and answered my attorneys' questions relating to those documents.

6. On July 24, 2025, the parties attended an all-day Mediation, and I made myself available that day to answer any questions that my attorneys had for me. I spoke with the attorneys about the factual disputes that were raised at the Mediation, and discussed the settlement alternatives offered at the Mediation.

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7. After the Mediation, as the parties were negotiating the settlement documents, I stayed in communication with my attorneys throughout this time period. Since the parties reached agreement on settlement, I have communicated with my attorneys regarding the settlement terms, and spent many hours reviewing the lengthy settlement agreement, and ensuring that the settlement agreement is fair to all class members.

8. As detailed above, I actively participated in all stages of litigation and have been continuously apprised of all aspects of this case.

9. I have been diligent, and I believe I acted above and beyond that which was expected of me as a Class Representative throughout all stages of the litigation, up to and including the settlement of this Class Action. I understand and agree to my fiduciary obligations and responsibilities as a class representative, and I have agreed to act in the best interests of the class in pursuing the claims alleged in this case. I also have no claims that are antagonistic to the class, as my interests are aligned with all other class members to obtain the best possible resolution for the class.

10. I believe that the Class Action Settlement and PAGA representative settlement in the gross amount of $600,000 obtained on behalf of the class is reasonable in view of the complex and varied issues involved with the case, as well as my understanding of Defendant's financial resources to fund such a settlement. I took into consideration the strength and weakness of the various claims for all employees and along with my attorneys agreed to the settlement. I was prepared to sit for trial, if necessary. I strongly support the settlement in this matter. When I was contemplating settlement, I always kept the best interests of the class and the aggrieved employees in mind over my own and I was not willing to settle the matter until I felt it was in the best interests of all class members and aggrieved employees.

11. In addition to performing work on this matter, I assumed a substantial risk in serving as a class representative if the Defendant prevailed in this case. My willingness to assume the financial risk was and is significant. Although I was confident in the merits of this lawsuit, I do not have any savings to speak of, and bringing this lawsuit was a serious

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commitment on my behalf and exposed myself to considerable risk. My attorneys have advised me that California law provides that the losing party must pay the prevailing party's costs. As such, if the Defendant had prevailed in this case, I would have been subjected to a cost award in the amount of tens of thousands of dollars. Notwithstanding these risks, I chose to serve in my capacity as Class Representative and pursue all claims against Defendant.

12. I am also providing a general release of all claims, even though during my employment, I frequently complained about the same wage issues involved in this case, and I believe I was treated differently because of my complaints. Moreover, if any future employer performs a Google search of my name, they will see that I have sued a former employer, which may affect my future employment possibilities. Notwithstanding that, I am releasing all claims against Defendant, and decided to represent the interests of other employees affected by Defendant's wage practices.

13. Given the above, I believe a $7,500 enhancement fee and general release payment is appropriate, and fair and reasonable in 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 November 18, 2026.

Signed by:
Ruby Rodriguez
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Ruby Rodriguez