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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 PEGGY J. REALI IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT** Date: December 15, 2026 Time: 1:30 p.m. Dept: 10

DECLARATION OF PEGGY J. REALI

I, Peggy J. Reali, declare as follows:

1. I am an attorney licensed to practice law in the State of California. Since June 2023 I have been a shareholder of United Employees Law Group, PC ("UELG"). UELG is co-counsel of record for Plaintiffs Ms. Palacio and Ms. Rodriguez in this matter along with Aaron Bartz of Bartz Law Group, APC, APC who served as lead counsel in this matter.

2. I submit this Declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement. I make this Declaration based on my personal knowledge except for those matters which are stated on information and belief, or after a detailed review of UELG business records, and if called to testify I could and would competently testify to the matters contained in this Declaration.

Settlement was Reached through Arms-Length Negotiations

3. I appeared at and participated in a full day of mediation on July 24, 2025 with my co-counsel Aaron Bartz. The mediator, Steve Mehta, is a very highly-reputed and successful California wage and hour class and PAGA action mediator. The parties engaged in arduous settlement negotiations via two (2) private mediations, after thorough investigation of the underlying facts by the respective parties and review of records, including an extensive review of financials related to Defendants. The proposed Settlement is clearly within the range of reasonableness, and Participating Class Members have clearly supported the Settlement by a ***100%*** participation rate as of the date of this Declaration. My co-counsel and I went into the mediation sessions willing to explore the potential for a settlement of the dispute, but we were also prepared to litigate their position through trial.

4. I believe that the Settlement is fair, adequate, and reasonable. In my opinion, the Settlement provides substantial monetary benefits to the Class, and to the LWDA and aggrieved employees, and is a product of diligent efforts to obtain the best possible result for the Class and the LWDA and aggrieved employees. This Settlement was reached following thorough legal and

factual research and analysis, thorough review of data relative to the claims in the action, arduous settlement negotiations, and thorough investigation of the underlying facts by the respective parties and review of records. The settlement negotiations were, at all times, adversarial and non-collusive in nature. In sum, I am well-suited to act as counsel for Plaintiff and other class members and aggrieved employees and will continue to vigorously represent the interests of the Class, and the LWDA and the aggrieved employees.

Qualifications of Counsel

5. My firm, and I personally, have extensive experience in litigating complex employment matters, including wage-and-hour class actions, representative PAGA actions, and related statutory claims. We have successfully prosecuted numerous class cases through contested certification, settlement, and final approval, resulting in substantial recoveries for California workers.

6. I am a graduate of the University of San Diego School of Law, and have practiced law since 1991. I have extensive experience in class action litigation, including wage and hour / PAGA litigation, and have been involved in litigating numerous mass torts in state and federal courts throughout the United States, to include, among others, against Big Tobacco culminating in the 1998 Big Tobacco Master Settlement, L-Tryptophan, Fen-Phen Litigation, Breast Implant Litigation, Vioxx Litigation, and the *2007 San Diego Wildfire Litigation*. I have conducted at least three trials, to include two jury trials and one bench trial, and have prepared for numerous trials which settled on the eve of trial.

7. I am a member of the California State Bar, San Diego County Bar Association, Consumer Attorneys of San Diego, and California Employment Lawyers Association.

8. I have served as class counsel in numerous wage-and-hour class and representative actions in both federal and state courts in California and other states since at least 2007, when I was employed as an attorney with the wage-and-hour class action firm then known as Cohelan & Khoury (now Cohelan, Khoury & Singer). In addition to extensive class action

and PAGA litigation experience with that firm, I have continued this practice through Reali Law, APC (beginning in 2017), served as Of Counsel and as an independent contractor with other well-regarded wage-and-hour and class action firms in California and other jurisdictions, and in addition, since 2023, have continued to litigate class and representative matters through United Employees Law Group. Since 2007, I have been appointed as class counsel, and/or performed substantial litigation work in cases in which my law firm was appointed as class counsel, and/or otherwise contributed to wage and hour class / PAGA litigations with class co-counsel, including, but not limited to, the following:

a. *Yeager v. Atlas Technical Consultants (CA), Inc*., Alameda Superior Court Case No. 23CV039836 (Reali appointed class counsel 11/3/2025, final approval of $500,000 Class / PAGA settlement);

b. *Duffie v. Reliable Energy Management, Inc*., Los Angeles Superior Court Case No. 23STCV28325 (Reali as counsel of record; participated in mediation; extensive contribution to approval briefing; Class / PAGA of $200,000);

c. *Fumera et al. v. LBC Mundial Corporation*, San Francisco Superior Court Case No. CGC-23-60896 (UELG appointed class counsel 12/26/2025, final approval of $503,000 Class / PAGA settlement);

d. *Villalobos v. Cornwall Security Services, Inc.*, Los Angeles Superior Court Case No. 22STCV28166 (Reali appointed class counsel 8/5/2024, final approval of Class / PAGA $230,000 settlement);

e. *Cebreros v. SmartCareMD Practice Management, LLC*, San Diego Superior Court Case No. 37-2019-00022973-CU-OE-NC (Reali appointed class counsel, final approval of $596,653 Class / PAGA settlement);

f. *Montgomery v. CEC Entertainment*, San Diego Superior Court Case No. 37-2020-00009952-CU-OE-CTL (Reali obtained class action settlement of $325,000; then defendant's Ch. 11 petition and subsequent settlement through bankruptcy court);

g. *Merino v. Wells Fargo and Company*, United States District Court, District of New Jersey Case No. 2:16-cv-07840-ES-MAH (Reali appointed class counsel, final approval granted, $35M settlement);

h. *Collins v. ITT Educational Service, Inc*., United States District Court, Southern District of California Case No. 12-cv-1395-DMS-BGS (firm appointed class counsel, final approval granted, $200,000 Class / PAGA settlement);

i. *Tenet Health Care Litigation* Los Angeles Superior Court JCCP 4377 (firm appointed class counsel, final approval granted, $85M settlement);

j. *Wells Fargo Wage and Hour Cases*, JCCP 004821, Alameda County Superior Court (firm appointed class counsel, final approval granted, $27.5M Class / PAGA settlement);

k. *Alvarez v. Farmers*, case number 3:14-cv-00574-WHO, (firm appointed class counsel, final approval granted, $4.9M settlement);

l. *Saldana v. Amazon*, Case No. 3:14-cv-00290-DJH (W.D. Ky.) (firm appointed class counsel, final approval granted, $3.77M settlement);

m. *Vangsoulatda v. Blue Shield*, San Francisco Superior Court Case No. CGC-14-543296 (firm appointed class counsel, final approval granted, $3 million settlement);

n. *Wells Fargo Bank Wage and Hour Cases*, Los Angeles Superior Court JCCP 4702 (*Layog v. Wells Fargo, et al.*) (firm appointed class counsel, final approval granted, $13M settlement);

o. *Kogok v. T-Mobile USA, Inc*., San Diego Superior Court Case No. 37-2012-00076945 (firm appointed class counsel, final approval granted, $2.75M settlement);

p. *Johnson v. Metlife Ins. Co*., Case No. 13-cv-128-JLS-RNB (C.D. Cal. Mar. 19, 2015) (firm appointed class counsel, final approval granted, $1.97M settlement);

q. *Loeza v. Chase Bank, NA*, United States District Court, Southern District of California Case No. 3:13-cv-95-L-BGS (firm appointed class counsel, class certified and settled for $970,000);

r. *Campagna et al. v. Language Line Services, Inc*., Orange County Superior Court Case No. 30-2012-00578934-CU-OE-CXC (firm appointed class counsel, final approval granted, $900,000 settlement);

s. *Santini v. Wells Fargo*, United States District Court, Northern District of California, Case No. 4:16-cv-01992-YGR (Reali appointed class counsel, final approval granted, $685,000 settlement).

My Curriculum Vitae will be produced upon request.

Attorneys' Fees / Lodestar

9. I personally performed at least **9.25 hours** of legal services on behalf of the Class, Aggrieved Employees and LWDA *through* November 13, 2026, via contemporaneous time recording, as follows: .50 hours (Pe-mediation prep); 6.50 (mediation); .25 (de-brief UELG team post mediation); .75 (communications with co-counsel and UELG team post-settlement); 1.25 (draft declaration iso final approval).

10. My hourly rate during the duration of rendering legal services is **$900 / hour**. My **lodestar is $8,325.00** (9.25 hours at $900 / hour).

11. In performing legal services, the undersigned has exercised billing discretion, and has not billed for every phone call, email reviewed, and the like. Moreover, I have been mindful to not log duplicative hours that were not reasonably necessary to the resolution of this case.

12. No charges have been included for paralegal or staff time spent on this matter.

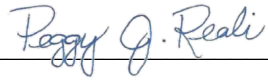
13. UELG sets its billing rates based on a review of the rates charged by other plaintiffs' attorneys involved in complex litigation in the State of California. I have reviewed and been informed of billing rates at several other class action / PAGA / representative firms in California, and my hourly rate of $900 is comparable to rates charged by other class action and employment

firms in this market for attorneys with similar levels of experience. My law firm requests the foregoing billable rate be applied in this case to the undersigned.

14. My hourly rate of $900 is reasonable and consistent with prevailing market rates for senior attorneys litigating complex wage-and-hour class and PAGA actions in Los Angeles, California and throughout California.

15. Costs of UELG are addressed in the concurrently-filed declaration of Walter Haines.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 16, 2026 at San Diego, California.



Peggy J. Reali