

Brian J. Mankin, Esq. [SBN 216228]
brian@lmlfirm.com
Misty M. Lauby, Esq. [CSB No. 243009]
misty@lmlfirm.com
LAUBY MANKIN LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF NAPA

VICTOR FIGUEROA and ALDEN
PEREZ, on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

MULTI-COLOR CORPORATION, an
Ohio Corporation; and DOES 1-50,
inclusive,

Defendants.

Case No.: 24CV000347

[Assigned to the Hon. Joseph J. Solga, Dept. B]

**DECLARATION OF PLAINTIFF
CYNTHIA IZQUIERDO IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL**

Hearing

Date: March 18, 2026

Time: 8:30 a.m.

Dept.: B

Complaint filed: March 7, 2024

I, Cynthia Izquierdo, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. When I first retained my attorneys (Lauby, Mankin & Lauby), I chose to pursue this case on a class action basis rather than as an individual claim. In that regard, I understood that I had specific burdens as the "Class Representative," which included: (a) representing the

1 interests of all class members, (2) considering the interests of all class members above my own
2 personal interests, (3) participating actively in the lawsuit, including potential testimony at
3 deposition and trial, and keeping generally aware of the status and progress of the lawsuit.
4 Moreover, I understood that any resolution of the lawsuit is subject to court approval and must
5 be designed in the best interests of the class as a whole.

6 3. Since first initiating this action on behalf of the proposed class, I believe that I
7 have more than adequately performed my duties as a class representative. I have been an active
8 participant in this litigation, including assisting my attorneys in various ways and making myself
9 available when needed, as well as proactively updating my attorneys when I found out new
10 information. For example, I have assisted my attorneys by compiling and analyzing substantial
11 documentation regarding the claims in this case. I have also helped to explain and discuss the
12 company's practices and their general practices and procedures, locating and analyzing company
13 documents, among others. I have also reviewed all settlement documents and believe that this
14 settlement is fair for the class. Finally, I will continue to take all steps necessary to finalize this
15 settlement and obtain court approval.

16 4. I have no conflicts with the proposed class members and will continue to assist
17 with the litigation and prosecute the case on behalf of the other employees. The claims I made in
18 this action are typical of the experience of the Class Members because we were all subjected to
19 Defendant's uniform practices in regard to payment of wages, meal and rest breaks, wage
20 statements, along with other issues.

21 5. I respectfully request that the court preliminarily approve the service award. As
22 outlined above, I have performed substantial services for the Class and helped obtain a highly
23 beneficial settlement for my fellow employees. To facilitate the class settlement, I have agreed
24 to waive all of my claims against the company as part of this settlement and in exchange for the
25 service award – which goes well beyond the release given by other class members. At the final
26 approval stage, I will submit an additional declaration setting forth all the work I did for this
27 case, including an estimated number of hours spent assisting the Class and my attorneys.

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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. Executed on Feb 23, 2026, at Fullerton, California.

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4 By: 
5 Cynthia Izquierdo (Feb 23, 2026 13:43:37 PST)
6 Cynthia Izquierdo
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