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Attorneys for Plaintiffs and the Putative Classes

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF NAPA

VICTOR FIGUEROA, ALDEN PEREZ,
CYNTHIA IZQUIERDO, and KENNETH
ZIEG on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

MULTI-COLOR CORPORATION, an Ohio
Corporation; WS PACKAGING GROUP,
INC.; and DOES 1-50, inclusive.

Defendants.

CASE NO.: 24CV000347

**DECLARATION OF VICTOR
FIGUEROA IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

HEARING INFORMATION

Date: October 20, 2026

Time: 8:30 a.m.

Dept.: B

Action Filed: March 7, 2024

DECLARATION OF VICTOR FIGUEROA

I, Victor Figueroa, 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.

2. I believe the settlement is fair and reasonable and constitutes a fair resolution of the alleged claims.

3. During my employment with Defendant, several issues concerned me that I believed did not comply with California law, including failure to pay all minimum and overtime wages, failure to pay all sick wages, failure to provide compliant meal periods and rest breaks, wage statement violations, waiting time penalties, failure to reimburse necessary business expenses, unfair competition, and PAGA Penalties. Although I was uncertain whether to bring a lawsuit because of the risks associated with stepping forward, including potential harm to my career and future employment prospects, I retained my attorneys and agreed to pursue this case on a class action basis because I believed that both other employees and I were not being treated lawfully.

4. When I first retained my attorneys and chose to pursue this case on a class action basis, I understood that I had specific responsibilities as the Class Representative, including representing the interests of all class members, placing the interests of the class on par with or above my own, actively participating in the litigation including deposition, and remaining generally informed about the status and progress of the case. I also understood that any resolution of the action is subject to Court approval and must serve the best interests of the class as a whole.

5. I respectfully request that the court approve the Service Award for the following reasons.

6. First, I have spent a substantial amount of time working on this case and have performed significant services for the Class to help obtain a highly beneficial settlement for my fellow employees.

7. On or about March 7, 2024, a Class Representative Action Complaint was filed in the Superior Court of California, Napa County. Subsequently, the complaint was amended to include a

1 cause of action under the Private Attorney General Act (“PAGA”) on behalf of myself, the State of
2 California, and other similarly aggrieved employees.

3 8. Since initiating this action, I estimate I have spent approximately 35-40 hours
4 engaging in activities to benefit the class. I have assisted my attorneys in numerous ways, including
5 explaining and discussing the company’s practices and procedures, locating and analyzing
6 company documents, and communicating with other class members. These efforts occurred through
7 numerous meetings with Class Counsel, telephone conferences, letters, emails, and text
8 communications. I also spent substantial time assisting with mediation preparation.

9 9. My work also continued after mediation, as I reviewed settlement agreements and
10 other settlement documents and continued communication with my lawyers during the settlement
11 approval processes.

12 10. Second, I respectfully request that the Court approve the agreed-upon service award
13 because I agreed to set aside my personal interests and put the class's interests ahead or on par with
14 my own. In doing so and successfully bringing this case as a class action, I helped obtain a highly
15 beneficial settlement for the class members.

16 11. Third, by bringing this case as a class action, I undertook significant risks and
17 stresses at a high emotional cost without any guarantee of success. For example, filing this lawsuit
18 and being a whistle-blower was stressful daily, as I constantly worried about the risk that this case
19 could impact my ability to find future jobs. This stress/risk persisted throughout the case, and I’m
20 worried it may make it hard to find a job in the future, since the case information is all available
21 online.

22 12. Fourth, bringing this case also came with a major financial risk because, if I lost the
23 case, I would be required to pay the company’s costs, and there was a chance they could try to make
24 me pay their attorneys’ fees as well.

25 13. I affirm my unwavering dedication to representing the interests of the putative class
26 and aggrieved employees. I voluntarily assumed considerable risks and expended considerable
27 effort to secure a favorable outcome. I trust that the Court will duly consider my request for a
28 Service Award in recognition of these contributions.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct. Executed on 2/23/2026, at vacaville, California.

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4 Signed by:
5 *Victor Figueroa*
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7 Victor Figueroa
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