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ALEX RUIZ and SAVANNAH RHUE

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

ISMAEL MERCADO, ALEX RUIZ and
SAVANNAH RHUE, individually and on
behalf of others similarly situated,

Plaintiffs,

vs.

NATURAL ALTERNATIVES
INTERNATIONAL, INC.; and DOES 1
through 25, inclusive,

Defendants.

Case No.: 37-2023-00052115-CU-OE-CTL
(Consolidated with Case No. 24CU008031C)

*Honorable Blaine K. Bowman
Department C-74*

**DECLARATION OF PLAINTIFF
SAVANNAH RHUE IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: February 20, 2026
Time: 8:30 a.m.
Dept: SD-74

Complaint Filed: December 1, 2023
Trial Date: Not Set

DECLARATION OF SAVANNAH RHUE

I, Savannah Rhue, declare and state as follows:

1. I am over the age of 18 and a California resident. I am a plaintiff named in this action. I have personal knowledge of the facts stated in this declaration and am competent to testify to them.

2. I was employed by Defendant Natural Alternatives International, Inc. as an hourly-paid, non-exempt assembly line associate from approximately October 2020 to approximately February 2021.

3. Because I believed Defendant's practices were unlawful, I sought legal advice about my work experiences and decided to pursue a lawsuit. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to hold Defendant accountable for failing to properly compensate employees for all hours worked and for meal and rest break violations. After my initial consultation, I researched class action lawsuits independently. I then consulted further with Blackstone Law, APC's attorneys, about class actions and representative actions under the Private Attorneys General Act to fully understand what pursuing such a lawsuit entailed before moving forward.

4. I have regularly conferred with my attorneys throughout this case as part of my responsibilities as a class representative. I searched for and provided documents concerning my employment with Defendant, answered my attorneys' questions about those documents, and provided information about the company's practices and the duties of other hourly-paid and non-exempt employees. I also assisted in developing discovery strategy regarding what additional documents and information to seek from Defendant.

5. I routinely communicated with my attorneys to ensure they had my current contact information and any additional information I obtained. I made myself available to answer questions about Defendant's practices and treatment of employees, responded promptly, and provided thorough information.

6. I understood that in the event this matter did not settle and proceeded with trial, I would need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any responsibilities that are necessary for this lawsuit.

7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several

1 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
2 also understood there was a risk of losing any job and/or income due to the time that I would have to
3 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In
4 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
5 claim or take the risk that I took in bringing this action.

6 8. I reviewed the settlement agreement, discussed the settlement agreement with my
7 attorneys, and asked them questions before signing it.

8 9. I have fulfilled all responsibilities my attorneys requested of me and worked diligently
9 to seek relief for the Class Members. I have spent approximately 45-50 hours participating in this case
10 as described above. My efforts as a class representative contributed to achieving this settlement.

11 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
12 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
13 throughout the course of this litigation, I have considered the interests of the Class and put them before
14 my own personal interests.

15 11. I understand that enhancement payments are discretionary and intended to compensate
16 named plaintiffs for the quality and quantity of work performed on behalf of the class and other
17 employees, the financial and reputational risks undertaken in bringing the action, and the benefits
18 resulting from the representative's efforts. Based on my contributions described above, I believe an
19 enhancement payment is warranted in this case.

20 12. I respectfully request the Court approve an enhancement payment of \$10,000 in
21 recognition of my efforts and active participation in this case and the broader general release of all
22 claims I have against Defendant. Given the time I dedicated to this case, I believe this amount is
23 reasonable.

24 13. I am not related to anyone associated with Blackstone Law, APC.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing
26 is true and correct. Executed on 01/22/2026, at Labelle, Florida.

27 *Savannah Rue*
28 Savannah Rhue