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Attorneys for Plaintiff, the Proposed Class, and all aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

JEFFREY LINDQUIST an individual, on
behalf of the State of California,

PLAINTIFF,

v.

TUMI STORES, INC.; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

CASE NO. 2024CUOE029752

[Case Assigned for All Purposes to the Hon.
Judge Charmaine H. Buehner in Dept. 44]

**DECLARATION OF JEFFREY
LINDQUIST IN SUPPORT OF
PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: May 13, 2026

Time: 1:30 P.M.

Dept.: 44

Complaint Filed: August 26, 2024

FAC Filed: March 31, 2026

Trial Date: None Set

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I, Jeffrey Lindquist, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the Named Plaintiff Plaintiffs in the matter of JEFFREY LINDQUIST, an individual, on behalf of the State of California, as private attorney general, v. Tumi Stores, Inc.; and DOES 1 thru 50, inclusive, Ventura County Superior Court, Case No. 2024CUOE029752. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Named Plaintiff. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as an Assistant Manager for Tumi Stores, Inc. (“Defendant” or “TUMI”).

3. In my role as an Assistant Manager, I regularly did not receive proper compensation for overtime at the appropriate rate of pay. I also did not receive thirty (30) minute uninterrupted meal periods within the first five (5) hours of my shift when working five hours or more. I regularly was not provided with ten-minute paid rest periods for every major fraction of four hours that I worked. I did not receive accurate itemized wage statements, and did not receive all wages due at the time of termination.

4. I have significant time throughout this class action working with Class Counsel. Before filing this action, in 2024, I researched and identified Counsel that I believed could best represent the interests of the Class Members. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Defendant and provided all relevant employment documents in my possession. In addition, I attended a full-day mediation on June 18, 2025. While at the Mediation, I actively participated in the discussions with the Class Counsel and shared my knowledge and insights in order to help the Class obtain a favorable settlement.

5. Throughout the entirety of this litigation, I have maintained regular contact with Class Counsel and assisted in any way possible by providing information and making myself available as needed.

1 6. Though I did not keep contemporaneous time records, I estimate I spent
2 approximately 15-20 hours on the above activities.

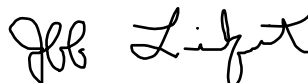
3 7. I was aware that by helping to initiate this lawsuit, my name would become known
4 and it was possible that my involvement in this matter could make it more difficult for me to obtain
5 employment in this field. Regardless, I believed it was important to proceed with this matter on
6 my behalf and on behalf of all others who were subject to the same problems during their
7 employment with TUMI.

8 8. Based upon my participation in this case, I understand the merits of this settlement
9 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
10 of the class. I believe this Settlement will benefit the Class.

11 9. It is my opinion that a fair and adequate Class enhancement for me as a Named
12 Plaintiff is \$7,000.00. I believe that it is fair and reasonable in view of all of the work I have
13 performed in my role as a Named Plaintiff. As Named Plaintiff, I actively participated in all stages
14 of the litigation as detailed above and have always maintained the best interest of the Class while
15 performing my Named Plaintiff duties.

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Executed this 20th day of April, 2026 at Camarillo,
19 California. (City)

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22 Jeffrey Lindquist
23 Declarant
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 21, 2026, I served all interested parties in this action the following documents described as: **DECLARATION OF JEFFREY LINDQUIST IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Elizabeth Staggs Wilson, Esq.
estaggs-wilson@littler.com
Jennifer W. Maguire, Esq.
jmaguire@littler.com
Bo Kyung Kim, Esq.
bkim@littler.com
LITTLER MENDELSON, P.C.
633 West 5th Street
63rd Floor
Los Angeles, California 90071

Attorneys for Defendant
TUMI STORES, INC.

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing("EF") System (<https://dir.tfaforms.net/432>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION) I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 21, 2026, at Chino, California.



Leslie Sanchez