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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

GEORGE AUSTIN THOMAS, individually,
and on behalf of other members of the general
public similarly situated;

Plaintiff,

v.

REISS (RETAIL) LIMITED, a United
Kingdom corporation; and DOES 1 through
100, inclusive,

Defendant.

Case No. 24STCV27146

**DECLARATION OF GEORGE AUSTIN
THOMAS IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: March 4, 2026

Time: 10:00 a.m.

Judge: Hon. Samantha Jessner

Dept.: 7

1 I, GEORGE AUSTIN THOMAS, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above-
4 entitled wage and hour class action lawsuit filed against Defendant REISS (RETAIL) LIMITED, a
5 United Kingdom corporation (hereinafter "Defendant").

6 2. This declaration is being submitted in support of Plaintiff's motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. I believe that I am, have been, and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims of the Class Members that I am
10 seeking to represent.

11 4. Generally, my lawsuit claims that Defendant failed to properly calculate the regular rate
12 of pay for purposes of overtime, sick pay, and meal period premiums, failed to pay for all hours
13 worked, failed to provide compliant meal and rest periods, failed to reimburse necessary expenditures,
14 failed to furnish accurate itemized wage statements, and failed to timely pay wages when due.

15 5. I was employed by Defendant from November 2023 to April 2024, as an hourly-paid
16 non-exempt employee. At all times during my employment, I was denied overtime, sick pay, and meal
17 period premiums properly calculated at the regular rate of pay, payment for all hours worked, legally
18 compliant meal and rest periods, reimbursement for necessary expenditures, accurate, itemized wage
19 statements, and timely payment for wages when due. Throughout my employment, I was subject to
20 Defendant's written policies and procedures.

21 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
22 to represent because I was subject to the same alleged unlawful employment policies and practices at
23 issue in this action, including but not limited to, Defendant's failure to properly calculate the regular
24 rate of pay for purposes of overtime, sick pay, and meal period premiums, failure to pay for all hours
25 worked, failure to provide compliant meal and rest periods, failure to reimburse necessary
26 expenditures, failure to furnish accurate itemized wage statements, and failure to timely pay wages
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1 when due. Factually, Defendant's policies and practices apply class-wide, and Defendant's liability
2 can be determined by facts common to all members of the Class.

3 7. Further, there is no conflict between my interests and the interests of the Class that I
4 seek to represent. My interests are entirely coextensive with the interests of the Class. I allege that I
5 was injured by the same company-wide policies and practices to which the proposed Class was
6 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
7 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the
8 proposed settlement to assure that it is fair.

9 8. I understood that at the time I filed this action, as a Class Representative, I owed a duty
10 to the putative class members to faithfully prosecute this action with their best interests at the forefront
11 of every decision. I understood that I could not make any decision in this action for the sole benefit
12 of my personal interest. I understood that, in executing this duty, I might have been asked to sacrifice
13 my personal best interests for the benefit of the interests of the putative class members. Nevertheless,
14 I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my
15 former co-workers for what I perceived to be Defendant's unlawful wage and hour practices. I believe
16 that I faithfully executed the duties of a Class Representative throughout this litigation and will
17 continue to do so until this litigation is fully and finally resolved.

18 9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
19 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
20 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

21
22 I declare under the penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct. Executed 10/27/2025, at Los Angeles, California.

24
25 By: George Austin Thomas (Oct 27, 2025 16:23:12 PDT)
26 **GEORGE AUSTIN THOMAS**
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