Aaron A. Bartz (SBN 198722)
aaron@bartzlawgroup.com
BARTZ LAW GROUP, APC
5151 California Ave., Suite 100
Irvine, California 92617
Tel: (949) 504-4413 / Fax: (949) 656-7760

Walter L. Haines, Esq. (SBN 71075)
walter@uelglaw.com
Peggy J. Reali (SBN 153102)
preali@uelglaw.com
UNITED EMPLOYEES LAW GROUP, PC
8605 Santa Monica Blvd., #63354
West Hollywood, CA 90069
Tel.: (562) 256-1047 / Fax: (562) 256-1006

Attorneys for Plaintiff EUGENE DELA PENA and all others similarly situated

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

EUGENE DELA PENA, an individual; on behalf of himself and all others similarly situated and the general public,

Plaintiffs,

v.

RENAL ADVANTAGE, INC., a Delaware corporation; and DOES 1 to 100, inclusive,

Defendants.

Case No. 3:24-cv-8649-JD

DECLARATION OF PEGGY J. REALI IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Date: June 11, 2026
Time: 11:00 a.m.
Location: Courtroom 11, 19th Floor

Removal Filed: December 2, 2024
Trial Date: January 25, 2027
Judge: Hon. James Donato

DECLARATION OF PEGGY J. REALI

I, Peggy J. Reali, declare:

1. I am an attorney at law, duly licensed to practice before all of the Courts of the State of California, and am admitted to practice before the Northern District of California. Since June 2023 I have been a shareholder of United Employees Law Group, PC ("UELG"). I am co-counsel of record for Plaintiff Eugene De La Pena ("Plaintiff") in this action.

2. I submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

3. I make this Declaration based on my personal knowledge except for those matters which are stated on information and belief, or after a detailed review of UELG business records, and if called to testify I could and would competently testify to the matters contained in this Declaration.

Settlement was Reached Through Arms-Length Negotiations

4. I appeared at and participated in a full day mediation with my co-counsel, Aaron Bartz. The mediator, Glen Lerman, is a well-reputed and successful wage and hour class action mediator. Settlement negotiations were at arm's length and, although conducted in a professional manner, were adversarial. My co-counsel and I went into the mediation session willing to explore the potential for a settlement of the dispute, but we were also prepared to litigate their position through trial. I support the proposed Settlement as being in the best interests of the Class Members and aggrieved employees.

Qualifications of Counsel

5. My firm, and I personally, have extensive experience in litigating complex employment matters, including wage-and-hour class actions, representative PAGA actions, and related statutory claims. We have successfully prosecuted numerous class cases through contested

certification, settlement, and final approval, resulting in substantial recoveries for California workers.

6. I am a graduate of the University of San Diego School of Law, and have practiced law since 1991. I have extensive experience in class action litigation, including wage and hour litigation, and have been involved in litigating numerous mass torts in state and federal courts throughout the United States, to include, among others, against Big Tobacco culminating in the 1998 Big Tobacco Master Settlement, L-Tryptophan, Fen-Phen Litigation, Breast Implant Litigation, Vioxx Litigation, and the *2007 San Diego Wildfire Litigation*. I have conducted at least three trials, to include two jury trials and one bench trial, and have prepared for numerous trials which settled on the eve of trial.

7. I am a member of the California State Bar, San Diego County Bar Association, Consumer Attorneys of San Diego, and California Employment Lawyers Association.

8. I have served as class counsel in numerous wage-and-hour class and representative actions in both federal and state courts in California and other states since at least 2007, when I was employed as an attorney with the wage-and-hour class action firm then known as Cohelan & Khoury (now Cohelan, Khoury & Singer). In addition to extensive class action and PAGA litigation experience with that firm, I have continued this practice through Reali Law, APC (beginning in 2017), served as Of Counsel and as an independent contractor with other well-regarded wage-and-hour and class action firms in California and other jurisdictions, and in addition, since 2023, have continued to litigate class and representative matters through United Employees Law Group. Since 2007, I have been appointed as class counsel, and/or performed substantial litigation work in cases in which my law firm was appointed as class counsel, and/or otherwise contributed to wage and hour class / PAGA litigations with class co-counsel, including, but not limited to, the following:

a. *Yeager v. Atlas Technical Consultants (CA), Inc*., Alameda Superior Court Case No. 23CV039836 (Reali appointed class counsel, final approval of $500,000 settlement);

b. *Duffie v. Reliable Energy Management, Inc*., Los Angeles Superior Court Case No. 23STCV28325 (Reali as counsel of record; participated in mediation; extensive contribution to approval briefing; class action settlement of $200,000);

c. *Fumera et al. v. LBC Mundial Corporation*, San Francisco Superior Court Case No. CGC-23-60896 (Reali appointed class counsel, final approval of $503,000 settlement);

d. *Villalobos v. Cornwall Security Services, Inc.*, Los Angeles Superior Court Case No. 22STCV28166 (Reali appointed class counsel, final approval of $230,000 settlement);

e. *Cebreros v. SmartCareMD Practice Management, LLC*, San Diego Superior Court Case No. 37-2019-00022973-CU-OE-NC (Reali appointed class counsel, final approval of $596,653 settlement);

f. *Montgomery v. CEC Entertainment*, San Diego Superior Court Case No. 37-2020-00009952-CU-OE-CTL (Reali obtained class action settlement of $325,000; then defendant's Ch. 11 petition and subsequent settlement through bankruptcy court);

g. *Merino v. Wells Fargo and Company*, United States District Court, District of New Jersey Case No. 2:16-cv-07840-ES-MAH (Reali appointed class counsel, final approval granted, $35 million settlement);

h. *Collins v. ITT Educational Service, Inc*., United States District Court, Southern District of California Case No. 12-cv-1395-DMS-BGS (firm appointed class counsel, final approval granted, $200,000 settlement);

i. *Tenet Health Care Litigation* Los Angeles Superior Court JCCP 4377 (firm appointed class counsel, final approval granted, $85m settlement);

j. *Wells Fargo Wage and Hour Cases*, JCCP 004821, Alameda County Superior Court (firm appointed class counsel, final approval granted, $27.5 million settlement);

k. *Alvarez v. Farmers*, case number 3:14-cv-00574-WHO, (firm appointed class counsel, final approval granted, $4.9 million settlement);

l. *Saldana v. Amazon*, case number 3:14-cv-00290-DJH (W.D. Ky.) (firm appointed class counsel, final approval granted, $3.77 million settlement);

m. *Vangsoulatda v. Blue Shield*, San Francisco Superior Court Case No. CGC-14-543296 (firm appointed class counsel, final approval granted, $3 million settlement);

n. *Wells Fargo Bank Wage and Hour Cases*, Los Angeles Superior Court JCCP 4702 (*Layog v. Wells Fargo, et al.*) (firm appointed class counsel, final approval granted, $13 million settlement);

o. *Kogok v. T-Mobile USA, Inc*., San Diego Superior Court Case No. 37-2012-00076945 (firm appointed class counsel, final approval granted, $2.75 million settlement);

p. *Johnson v. Metlife Ins. Co*., Case No. 13-cv-128-JLS-RNB (C.D. Cal. Mar. 19, 2015) (firm appointed class counsel, final approval granted, $1.97 million settlement);

q. *Loeza v. Chase Bank, NA*, United States District Court, Southern District of California Case No. 3:13-cv-95-L-BGS (firm appointed class counsel, class certified and settled for $970,000);

r. *Campagna et al. v. Language Line Services, Inc*., Orange County Superior Court Case No. 30-2012-00578934-CU-OE-CXC (firm appointed class counsel, final approval granted, $900,000 settlement);

s. *Santini v. Wells Fargo*, United States District Court, Northern District of California, Case No. 4:16-cv-01992-YGR (Reali appointed class counsel, final approval granted, $685,00 settlement).

My Curriculum Vitae will be produced upon request.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of April, 2026, at San Diego, California.



Peggy J. Reali