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Attorneys for Defendant
IKEA DISTRIBUTION SERVICES, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS KERN

MARIBEL GONZALEZ and BEATRIZ RAMIREZ, as individuals and on behalf of all others similarly situates,

Plaintiffs,

v.

VOLT MANAGEMENT CORP., a Delaware Corporation; IKEA DISTRIBUTION SERVICES, INC., a Delaware Corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: BCV-24-103281

Assigned for all purposes to Hon. Thomas S. Clark, Dept. 17

DECLARATION OF SHAREEF S. FARAG IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Complaint Filed: September 26, 2024
Trial Date: None set.

BAKER & HOSTETLER LLP
ATTORNEYS AT LAW
LOS ANGELES

DECLARATION OF SHAREEF S. FARAG

I, Shareef S. Farag, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a Partner at the law firm Baker & Hostetler LLP, attorneys of record for Defendant IKEA Distribution Services, Inc., in the above-captioned action. I make this declaration in support of Plaintiffs Maribel Gonzalez and Beatriz Ramirez's Motion for Preliminary Approval of Class Action and PAGA Settlement in this action. I have personal knowledge of all facts and matters set forth in this declaration and could and would testify competently and truthfully to the same if called as a witness and placed under oath.

2. The parties have agreed to use Phoenix Class Action Administration Solutions ("Phoenix") as the neutral third-party settlement administrator, and respectfully request this Court appoint Phoenix to conduct settlement administration. No one at Baker & Hostetler LLP has any financial interest in or otherwise has a relationship with Phoenix which would create an actual or potential conflict of interest.

3. Other than this action, and the action entitled Maribel Gonzalez, et al., as an aggrieved employee, and on behalf of all other aggrieved employees under the Labor Code Private Attorneys' General Act of 2004 v. Volt Management Corp., et al., and Does 1 through 100, inclusive, Case No. BCV-24-103281, I am not aware of any pending matter or action asserting claims that will be extinguished or adversely affected by Plaintiff's proposed settlement in this action.

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

Executed on this 29th day of October, at Los Angeles, California.

SHAREEF S. FARAG