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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

SARAH ARREDONDO, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiff,

v.

VENDOR DIRECT SOLUTIONS, LLC, a
California limited liability company; VENDOR
DIRECT CAPITAL SERVICES. LLC, a
California limited liability company; and
DOES 1-50, Inclusive,

Defendants.

Case No. 25STCV00317

**DECLARATION OF SARAH ARREDONDO
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

Date: February 2, 2027

Time: 10:00 a.m.

Judge: Hon. Samantha Jessner

Dept.: 7

1 I, SARAH ARREDONDO, 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 wage and hour action filed against Vendor Direct Solutions, LLC, and Vendor Direct Capital Services,
5 LLC, (hereinafter “Defendants”).

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 and Aggrieved
10 Employees that I am seeking to represent.

11 4. I worked for Defendants as a non-exempt employee in California in August of 2024. At
12 all times during my employment, I earned an hourly wage and was entitled to legally compliant meal
13 and rest periods, and minimum, regular and overtime wages for all hours worked. Throughout my
14 employment, I was subject to Defendants’ policies and procedures.

15 5. Generally, my lawsuit claims that Defendants failed to pay for all time worked, failed to
16 provide complaint meal and rest periods, failed to reimburse for required business expenses, failed to
17 furnish accurate itemized wage statements, and failed to pay all wages when due.

18 6. I believe that my claims are typical of the claims of the Class Members and Aggrieved
19 Employees that I am seeking to represent because I was subject to the same alleged unlawful
20 employment policies and practices at issue in this action, including but not limited to, Defendants’
21 failure to provide complaint meal and rest periods, failure to reimburse for mandatory business
22 expenses, failure to furnish accurate itemized wage statements, failure to pay for all hours worked, and
23 failure to pay all wages when due. Factually, Defendants’ policies and practices apply class wide, and
24 Defendants’ liability can be determined by facts common to all members of the Class.

25 7. Further, there is no conflict between my interests and the interests of the class that I am
26 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
27 I was injured by the same company-wide policies and practices to which the proposed Class was
28

1 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
2 of the Class by initiating this litigation and evaluating the proposed settlement to assure that it is fair.

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

12 9. On January 8, 2026, mediation was held. The Parties settled after mediation pursuant to
13 a mediator's proposal. When the Agreement was prepared, I reviewed the terms of the Agreement which
14 I signed on September 1, 2026.

15 10. I have reviewed the terms of the Agreement in its entirety, including the monetary terms
16 and releases. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
17 and made in the best interest of the Participating Class Members. Consequently, I respectfully, and
18 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

19
20 I declare under the penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed 09/04/2026, at Upland, California.

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23 By:  Sar Arredondo (Sep 4, 2026 09:10:11 PDT)
24 SARAH ARREDONDO
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