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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF CONTRA COSTA**

ARIANA RUIZ and JESSICA  
GUEVARA, individuals, on behalf of the  
State of California, as private attorneys  
general,

Plaintiff,

vs.

HIBBETT RETAIL, INC., a Corporation;  
and DOES 1 through 50, inclusive,

Defendants.

Case No.: C24-01389

**DECLARATION OF ARIANA RUIZ IN  
SUPPORT OF MOTION TO APPROVE  
PAGA SETTLEMENT**

Hearing Date:  
Hearing Time:

Dept: 16  
Judge: Hon. Benjamin T. Reyes II

Action Filed: May 24, 2024  
Trial Date: Not Set

1 I, Ariana Ruiz, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration, and  
3 I am making this declaration on behalf of myself, as a named plaintiff, and in support of the Motion  
4 to Approve Private Attorneys General Act Settlement.

5 2. I have worked in California as a non-exempt employee of Defendant Hibbett Retail,  
6 Inc. ("Defendant") since December of 2023.

7 3. I retained my attorneys who are experienced in PAGA representative action litigation  
8 and claims against employers for violations of the California Labor Code. I have no personal  
9 relationship or family ties to my attorneys or any officer of the Court. I am not aware of having any  
10 actual or potential conflicts of interest with another PAGA Member in this case nor am I aware of  
11 having any actual or potential conflicts of interest with the settlement administrator in this matter.

12 4. I was subject to Defendant's policies and practices that have been alleged as unlawful  
13 in the Complaint and the PAGA notice sent to the Labor and Workforce Development Agency. For  
14 example, I was forced to work off the clock as I was frequently required clock out on my phone for  
15 meal period, and I was not free to leave the premises or to meaningfully stop working. Instead, I had  
16 to quickly eat my lunch and resume working. Additionally, I did not always receive compliant meal  
17 and rest breaks, which were often late, short, interrupted, or missed entirely – and when these  
18 violations occurred, I did not receive all break penalty payments I was entitled to. Further, I was not  
19 reimbursed for the cost of my personal cell phone, which was used to carry out job duties for  
20 Defendant.

21 5. In bringing this case for myself, the State of California, and the other employees, I  
22 understood a lot of work would be required and I was willing to, and did, do the work to keep the case  
23 moving forward. For instance, before the complaint was filed I spoke to my attorneys several times  
24 and discussed how Defendant implemented its company policies and procedures. I also assisted my  
25 attorneys in their investigation into my claims by providing them documents and answering their  
26 questions. I reviewed the complaint before it was filed and after it was filed, I was given access to an  
27 electronic file sharing program that alerted me via email when important documents were filed so that  
28

1 I could review them and keep up with the developments in the case.

2 6. My attorneys explained to me the risks and benefits of bringing a representative action.  
3 I understood that I took on the risk, both professionally and financially, in pursuing the case as a  
4 representative PAGA action.

5 7. A mediation took place on July 8, 2025 with Hon. Carl J. West (Ret.), a well-  
6 respected and experienced wage and hour mediator. The mediation resulted in an agreement to settle  
7 the action. I communicated with my attorneys regarding the terms of the settlement which was reached  
8 between the parties and understood that the recovery in this case was for the benefit of my fellow  
9 coworkers, not just for me, and therefore wanted the best possible result to be obtained for the PAGA  
10 Members. I reviewed and signed the PAGA Settlement on December 1, 2025.

11 8. I have been actively involved with this lawsuit. Although I did not keep time records,  
12 I was in regular contact with my attorneys, reviewed court filings, and spent a significant amount of  
13 time on the issues presented during the lawsuit and in the settlement process. I estimate that I spent  
14 approximately 30-40 hours working on this case up until this point.

15 9. I reviewed the final PAGA Settlement Agreement, and I believe it is fair and  
16 reasonable given the facts of the case.

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

19 Executed on 04/23/2026, at Oakley, California.  
20 (date) (city, state)

21 

22 ariana ruiz (Apr 23, 2026 18:20:48 PDT)

23 Ariana Ruiz  
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