

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

Jeffrey S. Herman (State Bar #280058)

Sergio Julian Puche (State Bar #289437)

Trevor G. Moran (State Bar #330394)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858)551-1223

Facsimile: (858) 551-1232

Website: www.bamlawca.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

KAYLA RIVERA and RYLEIGH ROMERO,
DAPHINE ARCHER, ROBERT MORFIN,
and ADAM ORTIZ on behalf of the State of
California, as private attorneys general,

Plaintiffs,

vs.

LEGOLAND CALIFORNIA, LLC, a Limited
Liability Company; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 37-2024-00027344-CU-OE-CTL

**DECLARATION OF RYLEIGH ROMERO
IN SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT**

Hearing Date: July 10, 2026

Hearing Time: 8:30 a.m.

Judge: Hon. Blaine K. Bowman

Dept.: SD-74

Action Filed: June 11, 2024

Trial Date: Not Set

1 I, Ryleigh Romero, declare:

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

5 2. I worked in California as a non-exempt employee of Defendant Legoland California,
6 LLC (“Defendant”) from March of 2023 to January of 2024, and at all times was classified as a
7 non-exempt employee, paid on an hourly basis, and entitled to the legally required meal and rest
8 periods and payment of minimum and overtime wages due for all time worked.

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

15 4. I was subject to Defendant’s policies and practices that have been alleged as
16 unlawful in the Complaint and the PAGA notice sent to the Labor and Workforce Development
17 Agency. For example, I was forced to work off the clock, as I was required to arrive early to my
18 shift in order to park in Defendant’s designated employee parking lots and then walk to the “Security
19 Gatehouse”, which was the only location where employees were permitted to clock in and out.
20 Indeed, employees were prohibited from clocking in more than three minutes before the scheduled
21 start of their shifts. From the moment I entered the employee parking lot, I was subject to
22 Defendant’s control. When the primary employee parking lot was full, I was required to park in an
23 overflow lot and walk additional distances to the Gatehouse. Regardless of which lot I parked in, I
24 was required to walk to the Gatehouse and wait until I was permitted to clock in. As a result, I
25 routinely performed pre-shift work, and remained under Defendant’s control for several minutes
26 each workday without compensation. Additionally, I did not always receive compliant meal and
27 rest breaks, which were often late, short, interrupted, or missed entirely – and when these violations
28 occurred, I did not receive all break penalty payments I was entitled to.

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

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

12 7. A mediation took place on February 11, 2026, with Brandon McKelvery, Esq., a
13 well-respected and experienced wage and hour mediator. The mediation resulted in an agreement
14 to settle the action. I communicated with my attorneys regarding the terms of the settlement which
15 was reached between the parties and understood that the recovery in this case was for the benefit of
16 my fellow coworkers, not just for me, and therefore wanted the best possible result to be obtained
17 for the PAGA Members. I reviewed and signed the Memorandum of Understanding on March 3,
18 2026. When it was ready, I also closely reviewed and signed the PAGA Settlement Agreement.

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

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

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

Executed on 06/11/2026, at ryleigh romero.
(date) (city, state)


ryleigh romero (Jun 11, 2026 12:47:07 CDT)
Ryleigh Romero