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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SERENA NARO, individually and on
behalf of all others similarly situated;
TRISH GONZALES, individually and
on behalf of all others similarly situated;
AND THE CALIFORNIA LABOR
AND WORKFORCE
DEVELOPMENT AGENCY *ex rel.*
SERENA NARO AND TRISH
GONZALES, a California
governmental entity,

Plaintiffs,

v.

WALGREEN CO., an Illinois
corporation; and WALGREEN
PHARMACY SERVICES MIDWEST,
LLC, an Illinois corporation; and DOES
1-15,

Defendants.

Case No.: 4:22-cv-03170-JST

Assigned for All Purposes to:
Hon. Jon S. Tigar
Courtroom 6

**DECLARATION OF TRISH GONZALES IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA REPRESENTATIVE ACTION
SETTLEMENT**

Date: January 8, 2026
Time: 2:00 PM
Courtroom 6, via Zoom

Complaint Filed: May 31, 2022

1 **Declaration of Trish Gonzales in Support of Plaintiffs’ Motion for Final Approval of**
2 **Class Action and PAGA Representative Action Settlement**

3 I, Trish Gonzales, declare as follows:

4 1. I am one of the named plaintiffs in *Naro, et al. v. Walgreen Co., et al.*,
5 Northern District Court Case No. 4:22-cv-03170-JST and submit this declaration in support
6 of Plaintiffs’ Motion for Final Approval of Class Action and Private Attorneys General Act
7 (“PAGA”) Representative Action Settlement. I have personal knowledge of the facts set
8 forth in this declaration and could and would testify competently to them.

9 2. On May 31, 2022, I filed a lawsuit against my current employer, Walgreen Co.
10 and Walgreen Pharmacy Services Midwest, LLC (“Walgreens” or “Defendants”), and then a
11 First Amended Class Action Complaint on February 23, 2023, in the United States District
12 Court for the Northern District of California.

13 3. When I decided to step forward, I understood that this wasn’t just about me. I
14 knew that other Walgreens employees across California were dealing with the same issues,
15 and I wanted to speak up for all of us. I also understood that as a PAGA representative, I was
16 helping enforce the state’s labor laws on behalf of California itself. That responsibility felt
17 serious to me.

18 4. Throughout the lawsuit, I spent many hours talking with my attorneys by
19 phone and email. I shared details about my work experiences and what I saw happening with
20 other employees. I spent time explaining the process Walgreens used for purchasing
21 uniforms and how that affected us financially. That information helped my attorneys draft
22 the Complaint, prepare disclosures, and respond to discovery.

23 5. Preparing for my deposition also took time and effort. I reviewed documents,
24 went over questions, and then traveled from Madera to San Francisco for the in-person
25 deposition. The trip required taking two days off work and arranging my schedule around it.

26 6. Overall, I have spent a lot of time talking and corresponding with my
27 attorneys, reviewing documents, gathering evidence, assisting during settlement negotiations,
28

1 and reviewing settlement documents. I estimate that I have spent at least 40 hours working
2 on this case to date.

3 7. Throughout the case, I have stayed actively involved and will remain engaged
4 through the completion of the case.

5 8. Being a current employee made participating in this lawsuit especially
6 difficult. I was honestly scared about filing a case against my own employer. I worried about
7 being treated differently at work or that my job might be at risk. But I also felt it was unfair
8 that we had to spend our own money on clothing Walgreens required us to wear. That didn't
9 seem right, and I wanted to help fix it, not just for myself, but for everyone else who had to
10 do the same.

11 9. I also understood that being a named plaintiff meant taking personal risks,
12 including the chance that I could be responsible for Walgreens' costs if they won, or that
13 future employers might hesitate to hire me because I had participated in a lawsuit.
14 Nevertheless, I felt it was important for me and other Walgreens employees to be reimbursed
15 for the money we were spending on uniform clothing. I didn't think it was right that we had
16 to pay for clothing that our employer required us to wear.

17 10. During the settlement discussions, I stayed involved and was available to
18 answer questions. I helped my attorneys by reviewing my bank and credit card statements to
19 locate transactions for uniforms I purchased through Walgreens' website.

20 11. I carefully reviewed the settlement terms with my attorneys and asked
21 questions until I understood them. From what I know about the case, I believe this settlement
22 is fair and in the best interests of the Class Members. I understand Walgreens denies that
23 employees were required to buy Walgreens-branded uniforms, and I know the Court could
24 have ruled either way. Given the risks and uncertainty of continuing the case, I believe this
25 resolution is a fair one.

26 12. From the beginning, I knew this case could take years and involve risks to my
27 reputation and employment. Still, I believe class and representative actions are important
28 because they give regular employees a way to hold big companies accountable. Most people

1 couldn't afford to bring a case like this alone, but together, we can make sure everyone is
2 treated fairly.

3 13. For these reasons, I respectfully ask the Court to approve a service award in the
4 amount of \$10,000 to compensate me for the time and effort I have devoted to this case, the
5 personal and professional risks I assumed, and the benefits this settlement provides to the
6 Class Members and the Labor and Workforce Development Agency.

7
8 I declare under penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct. This Declaration was executed on
10 10/28/2025 at madera, California.

11
12 Trish Gonzales

Trish Gonzales (Oct 28, 2025 14:56:09 PDT)

13 Trish Gonzales
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