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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 SERENA NARO 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 Serena Naro in Support of Plaintiffs' Motion for Final Approval of Class**
2 **Action and PAGA Representative Action Settlement**

3 I, Serena Naro, 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 former employer, Walgreen Co.
10 and Walgreen Pharmacy Services Midwest, LLC ("Walgreens" or "Defendants"). I later
11 filed a First Amended Class Action Complaint on February 23, 2023, in the United States
12 District Court for the Northern District of California.

13 3. I understood that by filing this case as both a class action and a PAGA
14 representative action, I was representing not only my own interests but also those of other
15 Walgreens employees in California who were in similar situations. I knew I had a
16 responsibility to act in the best interests of these employees, and that as a PAGA
17 representative, I was also helping the State of California enforce its labor laws.

18 4. Throughout the case, I spent many hours on phone calls and emails with my
19 attorneys, sharing details about my own work experiences at Walgreens and what I knew
20 about how things worked for my coworkers. I explained, in particular, the process we went
21 through to purchase uniforms, which helped my attorneys understand the situation and
22 prepare the Complaint, initial disclosures, and discovery responses.

23 5. I also spent several hours gathering and sending evidence. This included taking
24 photographs and mailing dozens of pairs of Walgreens-branded scrubs that I had purchased
25 through the Walgreens website, to show the uniform expenses I personally paid out of
26 pocket.

27 6. I devoted additional time preparing for my deposition and then traveling to and
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1 attending it in San Francisco. The trip from Redding to San Francisco is about a four-hour
2 drive each way, and I had to take two days off from work and school, and make
3 arrangements for childcare and pet care.

4 7. During settlement discussions, I stayed in close contact with my attorneys,
5 answering questions about uniform voucher issues and reviewing my bank and credit card
6 records to locate uniform purchase transactions.

7 8. When the proposed settlement was reached, I carefully reviewed the terms with
8 my attorneys. Based on everything I learned through this case, I believe the settlement is in
9 the best interests of the Class Members. I understand that Walgreens continues to deny that
10 employees were required to buy Walgreens-branded uniforms, and that the Court could have
11 ruled either way on that issue. Given the risks and uncertainties of continued litigation, I
12 believe this settlement is fair and reasonable.

13 9. As a named plaintiff, I also understood that I was taking on certain risks,
14 including the chance that I might be held responsible for Defendants' costs if Walgreens had
15 won the case. I was also aware that being a plaintiff in an employment lawsuit could
16 potentially make it harder for me to find future work, since some employers might view my
17 participation negatively.

18 10. Even so, I felt strongly that Walgreens should be held accountable for its
19 uniform policy and that employees should be reimbursed for the expenses we had to pay
20 ourselves.

21 11. Throughout the case, I have remained actively involved and plan to stay
22 engaged through its completion. Overall, I estimate that I have spent at least 45 hours
23 working on this case — meeting and communicating with my attorneys, reviewing
24 documents, gathering evidence, assisting during settlement negotiations, and reviewing
25 settlement papers.

26 12. From the start, I understood that participating in a class and PAGA action
27 meant accepting certain risks, including reputational harm, possible financial liability for
28 costs, and a long case timeline. Still, I believe these types of cases are important because

1 they allow employees to come together and hold employers accountable, especially when
2 individual claims are too small to pursue on their own.

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.

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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 Redding, California.

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Serena Naro (Oct 28, 2025 14:06:51 PDT)

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