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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

VIANNA MONARQUE RALH,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiff,

vs.

RO HEALTH, LLC, a Delaware limited
liability company; RO HEALTH, INC., an
unknown business entity; RO HEALTH
HOLDINGS, LLC, a Delaware limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 25CV022017

Honorable Jill H. Talley
Department 8A

CLASS ACTION

**DECLARATION OF PLAINTIFF VIANNA
MONARQUE RALH IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: October 9, 2026
Time: 9:00 a.m.
Department: 8A

Complaint Filed: September 16, 2025
Trial Date: None Set

DECLARATION OF VIANNA MONARQUE RALH

I, Vianna Monarque Ralh, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned action and the named plaintiff in the action entitled *Vianna Monarque Ralh v. Ro Health, LLC, et al.*, Sacramento County Superior Court, Case No. 25CV028110. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Ro Health, LLC, Ro Health, Inc., and/or Ro Health Holdings, LLC, (collectively, "Defendants") from approximately January 2025 to May 2025, as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for **5 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the California Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the cases, I was informed of and came to understand what my duties and responsibilities would be as a class representative, and also, if class certification were to be obtained, what my duties and responsibilities would be in that event.

3. Throughout the matter, I have spent over **5 hours** speaking with my attorneys regarding the matter and over **3 hours** fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid, non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my

1 attorneys and their staff to make sure that they had all of my most current information and any
2 additional information that I had obtained.

3 4. Throughout this matter, I was available to answer any questions my attorneys had,
4 and available to speak and meet with my attorneys whenever they needed me. I responded to
5 them as quickly as possible and gave them as much information and identified as many docu-
6 ments as I could. I spent at least **4 additional hours** speaking with my attorneys about the matter,
7 identifying potential witnesses, providing my attorneys with documents and information con-
8 cerning the matter, and also describing policies, practices, and procedures of Defendants.

9 5. As far as the settlement is concerned, I was available to review documents and an-
10 swer any questions my attorneys had. I spent about **3 hours** reviewing the Memorandum of Un-
11 derstanding and the Settlement Agreement and about **2 hours** discussing the questions I had re-
12 garding the potential settlement with my attorneys before signing the settlement papers.

13 6. I understand that a settlement has been reached in this matter and what my duties
14 and responsibilities are as a class and PAGA representative. For example, I am aware that if the
15 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,
16 and likely appoint me as the representative of the class and my attorneys as counsel for the class.
17 I also understand that my duties will include checking in on, monitoring, and conferring with my
18 attorneys to facilitate the notice and settlement administration process, and to provide informa-
19 tion that the Court needs in order to assess whether the settlement is fair, reasonable, and ade-
20 quate. Further, if any individuals who are potential class members contact me, I will take steps to
21 have them referred to the Court-appointed settlement administrator so that these individuals may
22 receive the necessary information and notice they may be eligible to receive in connection with
23 the settlement and contemplated final approval hearing.

24 7. I believe that I have done everything that my attorneys have asked of me and have
25 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
26 members and the State of California with respect to aggrieved employees. I have volunteered to
27 represent and champion the interests of many other people with similar claims and injuries be-
28 cause of the importance of the cases and the necessity that all class members and aggrieved em-
ployees

benefit from the lawsuits equally. I understand that as a proposed class representative, and if formally appointed as a class representative, I have and continue to represent the interests of all members of the class in litigation to recover relief for the class. As an hourly-paid, non-exempt employee of Defendants who was subject to the same policies, practices, and procedures as the other members of the class, I have claims that are typical of those of the class. I consider the interests of the class just as I would consider my own interests. I understand that I may need to put the interests of the class before my own interests, although I have no reason to believe that my interests are in conflict with the interests of the class. I understand that any resolution of the lawsuits are subject to court approval and must be in the best interest of the class as a whole. I have participated, and continue to participate, in the lawsuits as necessary. I have actively followed and monitored the progress of the lawsuits, and have taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that I have retained.

8. I think my efforts helped to get the result obtained in this matter, and as a potential class and PAGA representative, I respectfully request that the Court award me an enhancement award for my efforts in pursuing and participating in this matter. Taking into consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

9. I am not related to anyone associated with Lawyers for Justice, PC.

10. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, my share of the settlement as a class member and aggrieved employee, and a separate payment pursuant to the Confidential Settlement and General Release Agreement for, *inter alia*, my general release and waiver of claims.

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

09/14/2026

Executed this ____ day of September 2026, at Sacramento, California.

Electronically Signed 2026-09-15 02:17:44 UTC - 76.158.189.54
Nintex AssureSign® 7f66cd2c-2005-4cd6-b450-b4c60005626

Vianna Monarque Ralh