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5 *Attorneys for Plaintiff and*  
6 *the Proposed Settlement Class*

7  
8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF SAN DIEGO**  
10

11  
12 IRINA ZHURAVLEVA, on behalf of herself )  
and all others similarly situated, )

13 Plaintiffs, )

14 v. )

15 U.S. OUTLET STORES, LLC, DBA U.S. )  
16 POLO ASSOCIATION., and DOES 1 through )  
17 100, inclusive, )

18 Defendants. )  
19 )  
20 \_\_\_\_\_ )

CASE NO.: 37-2019-00036327-CU-BT-CTL

**CLASS ACTION**

**DECLARATION OF PLAINTIFF  
IRINA ZHURAVLEVA IN  
SUPPORT OF PLAINTIFF'S  
UNOPOSED MOTION FOR AWARD  
OF ATTORNEYS' FEES, EXPENSES,  
AND INCENTIVE AWARD**

[IMAGED FILE]

Date: October 21, 2022  
Time: 1:30 p.m.  
Dept: C-69  
Judge: Hon. Katherine A. Bacal

1 **DECLARATION OF IRINA ZHURAVLEVA**

2 I, Irina Zhuravleva, hereby declare as follows:

3 1. I am a plaintiff in the above-entitled lawsuit. I make this declaration based upon  
4 my personal knowledge, unless otherwise indicated. If called upon as a witness, I could and  
5 would competently testify to these matters. I submit this declaration in support of Plaintiff's  
6 Unopposed Motion for an Award of Attorneys' Fees, Expenses, and Incentive Award.

7 2. Defendant U.S. Outlet Stores, LLC, dba U.S. Polo Association, ("Defendant")  
8 has agreed to pay me, as a Class Representative in this class action, the sum of \$2,500 for my  
9 time and effort in instituting, prosecuting and bearing the laboring oar and risk of this litigation,  
10 both financial and otherwise. The incentive award was agreed to through arm's-length  
11 negotiations, and only after the parties had agreed to all substantive terms relating to Class  
12 compensation. I have personally dedicated a substantial amount of time and effort in  
13 representing the Class, including meetings with Class Counsel, participating in the discovery  
14 process and in settlement discussions.

15 3. This lawsuit arises out of a purchase I made from a U.S. Polo Association Outlet  
16 Store on December 16, 2018, in Commerce, California. At that time, I purchased several  
17 Products after relying on Defendant's false discounts and false "regular" former prices for the  
18 products on the price tags.

19 4. Prior to filing the lawsuit, I spoke about Defendant's false and misleading  
20 discounting practices with Class Counsel to determine if it was a violation of the law. I also  
21 spoke to Class Counsel to gain an understanding of how the legal process would work in a class  
22 action. I spent approximately four hours on these specific communications and investigation to  
23 determine the prevalence of the practice.

24 5. I decided to pursue legal action in order to force Defendant to change its pricing  
25 practices. I agreed to file a Complaint based upon the investigation and further discussions.  
26 I reviewed and approved the Complaint before it was filed against Defendant, and the  
27 allegations are true and correct based on my information and belief. In-person meetings and  
28 various communications with Class Counsel regarding legal action and reviewing the Complaint  
took about five hours.

1           6. I also took the time to review all significant documents and information provided by  
2 Defendant to Class Counsel regarding its Outlet Stores in California. I consulted with Class  
3 Counsel about the information. I routinely sent inquiries to Class Counsel about the status of the  
4 case. I spent about three hours on these tasks.

5           7. I also gathered information and documents in support of the claims and responded  
6 to written inquiries from Class Counsel. This work was undertaken in order to assist my  
7 attorneys with preparing the Complaint, the discovery directed to me, and the anticipated class  
8 certification motion. I spent about five hours on these tasks.

9           8. I stayed very involved in the settlement discussions, including the settlement  
10 approval process. I kept informed of all developments, and fully reviewed the settlement  
11 agreement, and various class notices. I have continued to keep informed about the settlement  
12 process after the Court granted preliminary approval of the settlement. I believe that the  
13 settlement is fair, reasonable and in the best interests of the Class and that my efforts  
14 significantly attributed to Defendant modifying its pricing practices and compensating Class  
15 Members for the damages they suffered as a result of Defendant's former practices. I spent  
16 approximately five hours on this process.

17           9. I have spent approximately 22 hours in acting as a Class Representative, and  
18 fulfilling those duties and obligations. I am a Manager at a real estate company.

19           I declare under penalty of perjury under the laws of the State of California that the  
20 foregoing is true and correct. Executed this 6<sup>th</sup> day of September, 2022 at Los Angeles,  
21 California.

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23 \_\_\_\_\_  
24 Irina Zhuravleva  
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