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Attorneys for Plaintiff Lolita Galvin, on behalf of herself and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

LOLITA GALVIN, on behalf of herself and
all “aggrieved employees” pursuant to Labor
Code § 2698 *et seq.*,

Plaintiff,

v.

EMPLOYER SOLUTIONS STAFFING
GROUP II, LLC, a Minnesota limited liability
company, CORONA MAGNETICS, INC., a
California corporation, and DOES 1 through
10, inclusive,

Defendants.

CASE NO: RIC2002048

Assigned to Hon. Harold Hopp, Dept. 1

**DECLARATION OF LOLITA GALVAN
IN SUPPORT OF UNOPPOSED MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF CLAIMS BROUGHT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT OF 2004,
AWARDING ATTORNEYS’ FEES,
COSTS, SERVICE AWARD PAYMENT,
AND REIMBURSEMENT OF
SETTLEMENT ADMINISTRATION
EXPENSES, AND DISMISSING ACTION
WITH PREJUDICE**

Date: June 17, 2024

Time: 8:30 a.m.

Dept.: 1

Reservation ID: 045744568069

Complaint Filed: June 18, 2020

1 I, LOLITA GALVAN¹, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit against Defendants Employer
3 Solutions Staffing Group II, LLC (“ESSG”) and Corona Magnetics, Inc. (“Corona”)
4 (ESSG and Corona are collectively referred to as “Defendants”) and I submit this
5 declaration in support of Plaintiff’s Unopposed Motion For An Order Approving
6 Settlement Of Claims Brought Pursuant To The Private Attorneys General Act Of 2004,
7 Awarding Attorneys’ Fees, Costs, Service Award Payment, And Reimbursement Of
8 Settlement Administration Expenses, And Dismissing Action with Prejudice. I am a
9 competent adult and worked for Defendant as a non-exempt employee between June 2019
10 and March 2020. I have personal knowledge of the facts set forth herein, and if called as
11 a witness to testify to them, I could and would do so competently.

12 2. I contacted my current attorneys when I questioned the employment
13 practices of Defendants prior to commencing this lawsuit. I accepted the opportunity to
14 act as a representative on behalf of other employees of Defendants in this action whom I
15 believed were being subjected to labor law violations. I pursued this case on a
16 representative basis so that I could help other employees recover for what I believed were
17 Defendants’ improper practices.

18 3. Specifically, I questioned Defendants’ policies of failing to pay all wages
19 due, to provide legally compliant rest periods, or compensation in lieu thereof, to issue
20 accurately itemized wage statements, and to timely pay all wages due at the separation of
21 employment. Through many discussions with my lawyers, I learned these may be illegal
22 practices and Defendants’ employees might have recourse for them.

23 4. By bringing this lawsuit, and throughout its course, I have put the interests
24 of other employees ahead of my own. I understood that I could possibly earn an incentive
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26 _____
27 ¹ My last name was inadvertently misspelled in this Action. My last name is Galvan.
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1 award if this case resolved itself favorably, but I also knew that I could also be responsible
2 for paying Defendants' attorneys' fees and costs if it did not.

3 5. My goal in bringing this lawsuit was to obtain a recovery on behalf of all
4 employees of Defendants, and even more importantly, to put an end to what I believed
5 were illegal practices on the part of Defendants. I believe I have achieved both through
6 this lawsuit and settlement.

7 6. I am very happy about the results of this litigation. I am satisfied that
8 Defendants are compensating other PAGA Members and the State for penalties that I
9 believe we are due.

10 7. At the onset of this case, I spent time through numerous phone calls with
11 several of my attorneys explaining what I understood to be Defendants' policies and
12 practices and how they were applied to other employees. I kept actively involved with the
13 status of this case throughout the litigation process, tracking the status of the case and
14 participating as much as possible.

15 8. While I have not maintained detailed time records of my activities in
16 connection with this litigation, I believe that I have spent a total of approximately 45 hours
17 assisting my attorneys with the preparation of this case and doing work and investigation
18 of the facts independent from my attorneys both before and during this case. I had my
19 deposition taken by Defendants and helped my attorneys prepare for two mediations.

20 9. Before this litigation commenced, and throughout its course, I spent
21 approximately 3-4 hours gathering, organizing, and reviewing documents and information
22 for this lawsuit. I sifted through many of my own documents and reviewed information
23 produced by Defendants as part of this litigation.

24 10. I communicated with my attorneys several times per month to track my
25 case's status. I have taken an active involvement in this matter throughout its course.

26 11. Taking the initiative with this case was very risky for me, both
27 professionally and financially. I put principal first and took a tremendous risk by filing
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1 this lawsuit. I am quite confident that pursuing this lawsuit will result in future
2 reputational harm to me. There is a stigma associated with suing one's former employer.
3 I suspect I may be adversely affected when it comes to obtaining future employment –
4 employers who discover that I sued Defendants in a representative action will likely avoid
5 hiring me.

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

8 Executed on May 20, 2024 at Corona, California.

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12 LOLITA GALVAN
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Title	Signature for Declaration
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