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Attorneys for Plaintiff

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

EDITH GUTIERREZ, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

DELTRONIC CORPORATION, a
California corporation; and DOES 1 through
100,

Defendants.

CASE NO. 30-2020-01139890-CU-OE-CXC

*[Case assigned for all purposes to the Hon.
Glenda Sanders, Dept. CX101]*

**DECLARATION OF EDITH GUTIERREZ
IN SUPPORT OF APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: April 16, 2021
Time: 1:30 p.m.
Dept.: CX101

Action Filed: April 27, 2018
Trial Date: None Set

DECLARATION OF EDITH GUTIERREZ

I, Edith Gutierrez, declare as follows:

1. I am an individual over the age of 18 and am the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed class action settlement ("Settlement") reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so. Because I do not speak or read English, I was interviewed in Spanish for this declaration with the assistance of an interpreter, who reviewed it with me and translated its contents from English to Spanish.

2. I worked for Deltronic Corporation ("Deltronic") as a "Machine Operator" from approximately May 18, 2003 to approximately May 10, 2019. During that time, I regularly worked 10-hour shifts Monday through Thursday, 8-hour shifts on Friday, and 6-hour shifts on Saturdays. Although I worked over 10-hours on many shifts, I was not provided a second meal period for those shifts and I was never allowed to take a third rest period because Deltronic combined rest periods into a single break. Deltronic did not record meal periods and I regularly was not provided with at least 30 minutes for a meal period, especially on Saturdays when I was only provided with a single 20-minute break. Deltronic required me to remain at the facility during my rest breaks if I wanted to be paid. If I left the facility then Deltronic required me to clock-out.

3. I brought this lawsuit because I wanted Deltronic to comply with the law and treat its employees fairly. I feel that I have taken on a greater burden than any of the other class members because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. Although I was fearful of retaliation, I wanted to move forward with the case anyway. Through my efforts, Deltronic has agreed to a settlement that will benefit current and former employees of Deltronic and I believe that I should be compensated for carrying the burden of this litigation for the benefit of the other employees.

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4. I have been actively involved in this case since it started. Among other things, I gathered relevant documents for use in the lawsuit and provided factual information to my attorneys, had discussions with my attorneys regarding the claims in the lawsuit and Deltronic's practices, and helped identify other employees who also experienced the same issues that I did while working for Deltronic. I estimate that I have spent at least 15 hours in total on these activities.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on Mar 9, 2021, 2021 in Garden Grove, California.

Edith Gutierrez

Edith Gutierrez (Mar 9, 2021 18:18 PST)

Edith Gutierrez