

Brian J. Mankin, Esq. [SBN 216228]
brian@lmlfirm.com
Peter J. Carlson, Esq. [SBN 295611]
peter@lmlfirm.com
LAUBY MANKIN LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff and on behalf of the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

MARIA SALGADO, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

AMERICAN JERKY COMPANY, LLC, a
Delaware Limited Liability Company;
JOBSOURCE, INC., a California
Corporation; JOBSOURCE MIRA LOMA,
INC., a California Corporation;
JOBSOURCE HOLDINGS, INC., a
California Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CIVDS 2016568
*[Assigned to Hon. Jessica Morgan, Dept S26,
for all purposes]*

**DECLARATION OF PLAINTIFF MARIA
SALGADO IN SUPPORT OF MOTION
FOR FINAL APPROVAL**

I, Maria Salgado, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of
all matters stated herein and could competently testify thereto. I make this declaration in support
of the motion for final approval of the class action settlement. I believe that the settlement is fair,
reasonable, and constitutes a fair resolution of the claims alleged.

1 2. During my employment with JobSource and American Jerky, I thought that were
2 issues with my pay and other aspects of my employment. Because of these issues, I started
3 researching California law and contacted attorneys regarding how I was treated.

4 3. I then contacted Lauby, Mankin & Lauby LLP and understood that I had two
5 options: (1) I could bring a class action to help all of the employees, but I would have to put their
6 interests ahead of my own, or (2) I could bring my individual case and claims and attempt to
7 maximize my individual recovery. This decision was very difficult because I wanted to
8 maximize my individual recovery, but I also wanted to help everyone else that was wronged by
9 the company. And, if I joined the class action, I was worried that I might get labeled as a
10 whistleblower, which might make it hard to find a job in the future. In the end, I decided that –
11 despite the risks – it was important to bring these claims as a class action to hold the company
12 accountable for how they treated their employees.

13 4. I respectfully request that the Court approve the agreed-upon service award for
14 the following reasons.

15 5. First, I have spent substantial time working on this case – at least 50 hours
16 engaged in activities to benefit the class. I have been an active participant in this litigation and
17 have assisted my attorneys in numerous ways, including helping to explain and discuss the
18 company’s practices and their general practices and procedures, locating and analyzing company
19 documents, and communicating with other class members. These efforts occurred through
20 numerous telephone conferences, letters, emails, and text communications. I also assisted in
21 preparation for mediation and helped obtain a positive result for the class.

22 6. Second, I respectfully request that the Court approve the agreed-upon service
23 award because I agreed to set aside my personal interests and to put the interests of the class
24 ahead or on par with my own. In doing so, and by successfully bringing this case as a class
25 action, I helped to obtain a highly beneficial settlement for the class members.

26 7. Third, as a condition of this class action settlement, I was required to release and
27 waive all possible individual claims against the company – something that none of the other class
28 members were required to give up. And although I did not have a case pending at the time, I was

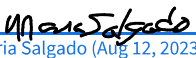
1 considering bringing a wrongful termination case for the way that I was terminated. Ultimately,
2 I agreed to waive my individual claims in exchange for a service award (which potentially
3 caused me to lose significant lost wages and other damages) because I believed it was in the best
4 interests of the class members.

5 8. Fourth, by bringing this case as a class action, I undertook significant risks and
6 stresses at a high emotional cost without any guarantee of success. For example, filing this
7 lawsuit and being a whistle blower was stressful on a day-to-day basis as I have constantly
8 worried about the risk that this case could impact my ability to find future jobs. And this
9 stress/risk lasted for the entire case, and I'm worried it may make it hard to find a job in the
10 future since the case information is all available online.

11 9. Fifth, bringing this case also came with a major financial risk because, if I lost the
12 case, I would be required to pay the company's costs, which could be over \$10,000, and there
13 was a chance they could try to make me pay their attorneys' fees as well.

14 Therefore, I respectfully request that the Court award the requested service award in full
15 as such amount is justified based on the above facts.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing is
17 true and correct. Executed on Aug 12, 2023, at Riverside, California.

18
19 By: 
20 Maria Salgado (Aug 12, 2023 10:01 PDT)
21 Maria Salgado
22
23
24
25
26
27
28