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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. Judge David Cohn, Dept S26,
for all purposes]*

**DECLARATION OF PLAINTIFF MARIA
SALGADO IN SUPPORT OF MOTION
FOR PRELIMINARY 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 preliminary approval of the class action settlement. I believe that the settlement
is fair and reasonable and constitutes a fair resolution of the claims alleged.

1 2. When I first retained my attorneys (Lauby, Mankin & Lauby), I chose to pursue
2 this case on a class action basis rather than as an individual claim. In that regard, I understood
3 that I had specific burdens as the “Class Representative,” which included: (a) representing the
4 interests of all class members, (2) considering the interests of all class members above my own
5 personal interests, (3) participating actively in the lawsuit, including potential testimony at
6 deposition and trial, and keeping generally aware of the status and progress of the lawsuit.
7 Moreover, I understood that any resolution of the lawsuit is subject to court approval and must
8 be designed in the best interests of the class as a whole.

9 3. Since first initiating this action on behalf of the proposed class, I believe that I
10 have more than adequately performed my duties as a class representative. I have been an active
11 participant in this litigation, including assisting my attorneys in various ways and making myself
12 available when needed. For example, I have assisted my attorneys by compiling and analyzing
13 substantial documentation regarding the claims in this case. I have also helped to explain and
14 discuss the company’s practices and their general practices and procedures, locating and
15 analyzing company documents, among others. I have also reviewed all settlement documents and
16 believe that this settlement is fair for the class. Finally, I will continue to take all steps necessary
17 to finalize this settlement and obtain court approval.

18 4. I have no conflicts with the proposed class members and will continue to assist
19 with the litigation and prosecute the case on behalf of the other employees.

20 5. I respectfully request that the court preliminarily approve the service award. As
21 outlined above, I have performed substantial services for the Class and helped obtain a highly
22 beneficial settlement for my fellow employees. And I have also agreed to waive all of my claims
23 against the company as part of this settlement and in exchange for the service award – which
24 goes well beyond the release given by other class members. At the final approval stage, I will
25 submit an additional declaration setting forth all the work I did for this case, including an
26 estimated number of hours spent assisting the Class and my attorneys.
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28

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on May 11, 2023, at Riverside, California.

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4 By: 
5 Maria salgado (May 11, 2023 18:49 PDT)
6 Maria Salgado
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