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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

HIROMI MEGURO, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

SILICON VALLEY BANK, a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 20CV369854

[Assigned to Hon. Sunil R. Kulkarni]

**DECLARATION OF HIROMI MEGURO IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: January 12, 2023
Time: 1:30 p.m.
Department: 1

Complaint Filed: August 28, 2020

1 I, Hiromi Meguro, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. In 2018 I began working for Silicon Valley Bank. Until my employment as a business
7 data analyst was terminated around August of 2020, I was paid on an hourly basis. I received wage
8 statements that identified the overtime rate as the base hourly rate of pay or one-half the hourly rate of
9 pay. The wage statements also show hours that, when added up, do not appear to add up to the actual
10 total hours worked. Certain wage statements show that I was paid a base hourly rate of pay of \$40.21
11 and suggest that overtime was paid at \$60.31 per hour only. I also am informed and believe that all
12 compensation, including bonuses, were not considered when calculating my regular rate of pay for
13 overtime purposes.

14 3. During the pendency of this lawsuit, I have done my best to represent the interests of the
15 employees that are part of the class. I have actively contributed to the litigation of this case. I estimate
16 that I have spent nearly 30 hours in connection with the litigation of this case. My contributions include
17 but are not limited to (i) participating in numerous telephonic meetings with my attorneys and their staff
18 to discuss the case and review documents prepared on my behalf, (ii) providing my attorneys with
19 information and documents regarding my employment with Defendant, (iii) searching for additional
20 information and documents requested by my attorneys, (iv) reviewing and approving the written notice
21 to the Labor and Workforce Development Agency and the complaint filed in court, (v) participating in
22 mediated settlement discussions, (vi) reviewing and executing the settlement agreement, and (vii)
23 reviewing and signing the declarations submitted to this Court in support of the settlement.

24 4. I understand that the class claims alleged in this action were brought on behalf of other
25 similarly situated employees, and thus I am acting as a representative for the Class. I understood that an
26 individual case would have resolved much faster than a class action and involved much less financial
27 risk than a class action.

1 5. Throughout the lawsuit, I have been kept apprised of the status of this case. As the class
2 representative, I understand that it is my responsibility to act in the Class's best interest and not my own.
3 I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any
4 conflicts that exist between my interest and the interests of the Class that would impair or affect my
5 ability to serve as representative for the Class.

6 6. I have and continue to be willing to assist in the investigation of this matter as well as
7 make myself available for trial or any further proceeding in this matter as required to represent the
8 interests of the Class. I also understand my duties and responsibilities to the proposed class and will
9 carry out those duties as necessary.

10 7. I have discussed the terms of the settlement agreement with my attorneys, and based on
11 my understanding of the case, I am of the opinion that settlement for the consideration and on the terms
12 set forth in the settlement agreement are fair, reasonable, and adequate, and in the best interests of the
13 Class.

14 8. I understood that filing this lawsuit is a public record and I accepted that burden. This
15 lawsuit is something that potential employers can look into, and which may cause a negative impact of
16 my employment prospects. I also understood that there were risks due to my involvement as a named
17 plaintiff in a representative lawsuit against a large employer. For instance, if I lost, I might have to face a
18 judgment for some of Defendant's legal costs. Even understanding all these risks, I was willing to move
19 forward and bring this case on behalf of the other employees.

20 9. As part of the settlement, I also agreed to sign a general release of claims and a waiver of
21 Civil Code section 1542.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct. Executed this 14th day of December 2022, at Saratoga, California.

24 DocuSigned by:

25 *Hiromi Meguro*

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27 Hiromi Meguro