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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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: September 29, 2022
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. I have taken all necessary steps to represent the interests of the Class, including by
15 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
16 and answering any questions that have come up, including about how I was paid or what my wage
17 statements show or meant. I remain willing to devote my time to this lawsuit for the benefit of the Class.
18 I do not believe I have any interests that are adverse to the interests of the Class. I also am unaware of
19 any such issues having been raised or presented by anyone else.

20 4. I believe many employees would not sue their employer out of fear. I took on risks by
21 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have
22 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class
23 settlement is fair, adequate, and reasonable.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is
25 true and correct. Executed this 21st day of July 2022, at Saratoga, California.

26 DocuSigned by:

Hiromi Meguro

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Hiromi Meguro