

MOON & YANG, APC
Kane Moon (SBN 249834)
Allen Feghali (SBN 301080)
Edwin Kamarzarian (SBN 327830)
1055 W. Seventh St., Suite 1880
Los Angeles, CA 90017
Telephone: (213) 232-3128
Facsimile: (213) 232-3125

Attorneys for Plaintiff
Dana Marie Ganal

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

ANDREW ZUBIA, DANA MARIE GANAL,
CHRISTIAN HERNANDEZ, and MICHAEL
WOODS individually, on a representative
basis, and on behalf of all others similarly
situated;

Plaintiff,

vs.

PROCTER & GAMBLE COMPANY, an
Ohio Corporation; PROCTER & GAMBLE
DISTRIBUTING LLC, and Ohio Company;
and DOES 1 through 20, inclusive;

Defendants.

Case No: 20STCV44506

*[Assigned to Hon. Lawrence P. Riff, Dept. 7,
for all purposes]*

**PLAINTIFF DANA MARIE GANAL'S
DECLARATION IN SUPPORT OF THE
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1 DECLARATION OF DANA MARIE GANAL

2 I, DANA MARIE GANAL, declare as follows:

3 1. I am a named Plaintiff in this case. I am a former employee of the named defendant,
4 Procter & Gamble Distributing LLC (“Defendant”). As such, I have personal knowledge of, or am
5 informed and believe, the following facts herein stated. If called as a witness, I could and would testify
6 competently to the following:

7 BACKGROUND OF EMPLOYMENT

8 2. I worked for Defendant as a forklift driver from approximately January 2021 to March
9 2021. Throughout my employment, I typically worked five days each workweek and roughly eight or
10 more hours each workday.

11 3. During my employment with Defendant, I realized that their wage and hour practices
12 placed employees, including me, at a disadvantage. For instance, I was not properly paid for all the time
13 I worked. I was not reimbursed my purchase of tools I needed to perform my job duties. Furthermore,
14 during my employment for Defendant, I could not take timely uninterrupted meal periods and rest
15 breaks.

16 COMMONALITY AND PREDOMINANCE

17 4. I believe that Defendant’s illegal wage and hour practices that affected me also affected all of
18 its hourly employees. For instance, the practice of requiring off-the-clock work before my scheduled shift
19 and upon returning from my meal period, was common among all employees, including others who
20 worked as forklift drivers. Also, I believe the Defendant improperly imposed an alternative workweek
21 schedule, which affected my overtime pay.

22 5. Also, others in my job position that worked at the same location that I worked, but during
23 different shifts or on different days, could not take uninterrupted meal and rest breaks.

24 6. As a result of Defendant failing to properly compensate for all wages, failing to provide
25 legally compliant meal periods and rest breaks, and failing to reimburse expenses, other employees and
26 I were subjected to these illegal wage and hour practices.

27 TYPICALITY AND ADEQUACY

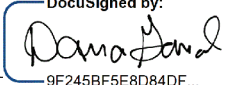
28 7. I was employed by Defendant in a non-exempt position during the alleged PAGA period. I

1 believe my alleged claims in this case impacted not only me but the entire group of aggrieved
2 employees.

3 8. I believe that I have no conflicts of interest with other class members and have agreed to
4 place Class interests above my own.

5 I declare under penalty of perjury, under the laws of the State of California, that the foregoing is
6 true and correct.

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8 Executed this 2/9/2023, at Riverside, California.

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11 DANA MARIE GANAL
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