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(Additional counsel on following page)

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;

Plaintiffs,

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

**CLASS ACTION DECLARATION OF
CHRISTIAN HERNANDEZ IN SUPPORT
OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Information:

Date: TBD

Time: TBD

Dept.: 7

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Cc H

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14 Attorneys for Plaintiff Michael Woods

1 I, Christian Hernandez, 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. I began working for Procter & Gamble Distributing LLC ("the Company") around
7 August 15, 2015. My employment with the company ended on April 5, 2021. Throughout my
8 employment with the Company, I was paid on an hourly basis as a non-exempt employee. During my
9 employment, the Company routinely failed to provide appropriate and timely off-duty meal and rest
10 breaks. Instead the Company routinely interrupted and/or shortened my meal and rest breaks.

11 3. Beginning in or around February 2020, the Company would require me to line-up to wait
12 to undergo and to undergo COVID-19 temperature checks before I was allowed to clock-in for my shift.
13 I am informed and believe I am owed wages for the time spent lining up to wait to undergo and to
14 undergo COVID-19 temperature checks.

15 4. I would also routinely work more than 8 hours per day or 40 hours per workweek, as
16 shown on actual time punch records. I am informed and believe that whenever my wages were paid, the
17 Company would round down or shave off the overtime hours I worked and not pay me for such time.

18 5. I am informed and believe that whenever wages were paid, the company would round
19 down and shave off the many hours I worked. These wages were not paid during my employment, nor
20 upon the end of my employment. I am also informed and believe that I received inaccurate wage
21 statements that, for example, failed to include the pay period start date or the applicable hourly rates of
22 pay for wages earned.

23 6. I have taken all necessary steps to represent the interests of the Class, including by
24 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
25 and answering any questions that have come up, including about how I was paid or what my wage
26 statements show or meant. I understand that I am responsible to the Class with respect to trying the case,
27 appearing in court, and working with Class Counsel. I am willing to act as a fiduciary for the Class. I
28 remain willing to devote my time to this lawsuit for the benefit of the Class. I do not believe I have any

1 interests that are adverse to the interests of the Class. I also am unaware of any such issues having been
2 raised or presented by anyone else.

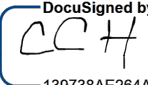
3 7. I believe many employees would not sue their employer out of fear. I took on risks by
4 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have
5 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class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

7 8. I understand that the settlement we have reached in this case must be approved by the
8 Court and I must protect the interests of all Settlement Class Members.

9 9. It is my understanding that because of my efforts in the action and in exchange for a
10 general release, I am requesting a Class Representative Payment in the amount of \$7,500.

11 10. It is also my understanding that the attorneys' representing the Plaintiffs in this action
12 will be splitting the attorneys' fees between their law firms as follows: 40% to Lauby, Mankin & Lauby
13 LLP, 20% to Moon & Yang, 20% to Schneider Wallace Cottrell Konecky LLP, and 20% to Lavi &
14 Ebrahimian, LLP. I approve of this fee splitting agreement and have given my consent in writing.

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16 I declare under penalty of perjury under the laws of the State of California that the foregoing is
17 true and correct. Executed this ¹_____ day of March 2023, at Moreno valley, California.

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DocuSigned by:

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Christian Hernandez