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Attorneys for Plaintiff, and all others
similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO – CENTRAL**

LIZBETH GARCIA, on behalf of herself
and all others similarly situated,

Plaintiffs,
v.

THE BAY CLUBS COMPANY, LLC; and
DOES 1 through 50, inclusive.

Defendants.

CASE NO.: 37-2018-00029247-CU-OE-CTL

**DECLARATION OF CAROLINE SALAZAR
IN SUPPORT OF PLAINTIFFS' UNOPPOSED
EX PARTE APPLICATION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: March 8, 2022
Time: 8:30 a.m.
Judge: Hon. Gregory W. Pollack
Dept: C-71
Complaint Filed: June 13, 2018
Trial Date: January 14, 2022

*[filed concurrently with Plaintiff Lizbeth Garcia's
Notice of Unopposed Ex Parte Application;
Plaintiff's Unopposed Ex Parte Application
Declaration of Jeffrey L. Hogue; Declaration of
Devon K. Roepcke; Declaration of William M.
Turner; Declaration of Ernesto Sanchez;
Declaration of Jeyson Pineda; Declaration of
Lizbeth Garcia; Declaration of Patricia Calderon;
Notice of Lodgment; Proposed Order; Proposed
Judgement; Request for Judicial Notice]*

1 I, Carolina Salazar, declare that:

2 1. I am the Plaintiff and PAGA representative in the action *Carolina Salazar v. The*
3 *Bay Clubs, LLC*, L.A.S.C. Case No. YC073022 (the “*Salazar Action*”). I have personal knowledge of
4 the facts stated herein, except for those stated on the basis of information or belief, which I believe to
5 be true.

6 2. I worked for Defendants for approximately three and a half years, starting as a
7 front-desk receptionist in March of 2014. As alleged in my complaint, Defendants underpaid or did
8 not pay me at all for my total hours worked, commissions, missed meal and rest breaks, overtime, and
9 wages due at discharge, they failed to reimburse me for expenses incurred, their wage statements were
10 not complete and accurate, among other violations of the law. With respect to rest breaks specifically,
11 I was part of the membership sales group, and I and others were expected to be “on call” while on her
12 rest breaks. My attempts to take rest breaks were constantly interrupted by her own supervisors to
13 address customers onsite. These were Defendants’ employment practices with respect to me and other
14 employees, which is the reason I brought this lawsuit on an individual basis and as a Private Attorney
15 General.

16 3. On or about May 14, 2018, I helped assisted my attorneys in preparing and
17 transmitted to the LWDA a letter outlining various labor code violations, including, but not limited to:
18 (1) failure to pay all wages earned, including overtime pay, within their respective pay period, in
19 violation of Labor Code § 204; § 510, and § 3(A) of IWC Wage Order 4-2001; (2) failure to pay all
20 wages owed upon discharge or resignation in violation of Labor Code §§ 201 and 202; (3) failure to
21 provide accurate wage statements as required by Labor Code § 226; (4) failure to pay for missed meal
22 and rest periods in violation of Labor Code § 226.7, § 512 and §§ 11 and 12 of IWC Wage Order 4-
23 2001; (5) failure to reimburse for their expenses incurred in discharge of their duties, in violation of
24 Labor Code § 2802; and (6) failure to provide a written agreement setting forth how my commissions
25 were computed and paid, in violation of Labor Code section 2751.

26 4. On July 19, 2018, I assisted my attorneys in preparing and filing an individual
27 and PAGA civil complaint against Defendants for the Labor Code violations described in her letter to
28 the LWDA.

1 5. In fulfillment of my responsibilities to a PAGA representative, I estimate I spent
2 in excess of 100 hours on the representative aspects of this case in order to get my attorneys all
3 documents that I had in my possession regarding my employment, review documents turned over by
4 Defendants, and answer my attorneys' many questions about the practices and procedures of
5 Defendants, among other things. I provided my attorneys with substantial documents and information
6 about, among other things, Defendants' wage and hour policies, practices, and deficiencies, including,
7 without limitation, detailed information on Defendants' meal and rest break policies, expense
8 reimbursement policies and practices, payment of commissions policies and practices, and practice of
9 requiring but not compensating for "off the clock" work.

10 6. I assisted my attorneys with the mediation session that occurred on October 1,
11 2021, with the Hon. Lisa H. Cole (Ret.), and the subsequent informal negotiations that occurred with
12 and without Judge Cole's involvement. I believe the settlement of this and the other PAGA actions is
13 fair and an excellent result.

14 7. I understand now that my name is in the public record as having filed a civil
15 lawsuit against my former employer as well as sending a letter to the Labor Workforce and
16 Development Agency about Dominos' labor practices. A lot of employers are using background checks
17 before they hire someone. Background checks are becoming more and more sophisticated and will
18 certainly pick up one or both of my filings. I do believe that most employers would not hire a person
19 who previously sued his or her previous employer for fear that it might happen again.

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct. Executed on February 25, 2022.

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23 Carolina Salazar
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eSignature Details

Signer ID:	pGW6Ef2k8asvGQjbXtLLHPY9
Signed by:	CAROLINA SALAZAR
Sent to email:	carolinar.salazar@gmail.com
IP Address:	107.77.229.229
Signed at:	Feb 25 2022, 11:11 am PST