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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

YANET GARCIA, individually, and on behalf
of other members of the general public
similarly situated; AUSTIN WILDER,
individually, and on behalf of other members
of the general public similarly situated and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiffs,

vs.

JOHNSON MATTHEY, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 37-2019-00003740-CU-OE-CTL

Honorable Eddie C. Sturgeon
Department C-67

CLASS ACTION

**DECLARATION OF YANET GARCIA
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Payments; Declaration of Class Counsel
(Edwin Aiwazian); Declaration of Class
Representative (Austin Wilder); Declaration
of Settlement Administrator (Jeremiah
Kincannon); and [Proposed] Final Approval
Order and Judgment filed concurrently
herein]

Date: May 28, 2021
Time: 9:00 a.m.
Department: C-67

Complaint Filed: January 18, 2019
FAC Filed: January 11, 2021
Trial Date: None Set

DECLARATION OF YANET GARCIA

I, **Yanet Garcia**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Johnson Matthey, Inc. ("Johnson Matthey") in an hourly-paid, non-exempt position from approximately August 2009 to May 2017. I decided to seek legal advice about my work experiences with Johnson Matthey and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Johnson Matthey paid me and other employees what was owed to us for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours to discuss my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over 18 hours meeting and corresponding with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents concerning my employment with Johnson Matthey, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the work performed by other non-exempt employees at Johnson Matthey, and helping develop a strategy as to what documents and information to obtain from Johnson Matthey. I frequently checked in with my attorneys and their staff to make sure that they had my most current information and any additional information that I had obtained.

4. Throughout the case, I was available to answer any questions my attorneys had, and available to speak and meet with them whenever they needed me. I responded to my attorneys as quickly as possible and gave them as much information and identified as many

documents as I could. I spent at least 13 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Johnson Matthey. During the discovery phase of the litigation, I spent approximately 11 additional hours reviewing Johnson Matthey's discovery requests and deposition notices, locating documents, and providing documents and responses to my attorneys.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 3 hours reviewing the settlement documents and about 3 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement papers.

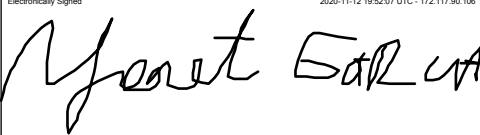
6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me an enhancement payment in the amount of \$10,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement fund as a class member.

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

Executed on November 12, 2020, at Temecula, California.

Electronically Signed 2020-11-12 19:52:07 UTC - 172.117.90.106

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Yanet Garcia