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9 Attorneys for Plaintiff,
YANNET JIMENEZ on behalf of herself and all similarly situated employees
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12 **SUPERIOR COURT OF CALIFORNIA**

13 **COUNTY OF MONTEREY**

14 YANNET JIMENEZ on behalf of herself
and all similarly situated employees,

15 v.

16 SAMBRAILO PACKAGING; and DOES 1
17 through 50, inclusive,

18 Defendants.
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Case No. 20CV003281

**DECLARATION OF YANNET JIMENEZ
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: November 3, 2023
Time: 8:30 a.m.
Dept: 15

Complaint Filed: December 7, 2020
FAC Filed: April 18, 2023
Trial Date: Not Set

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1 earned, all hourly rates of pay and the number of hours worked at each rate, and other
2 information required by law.

3 8. During the pendency of this lawsuit, I was required to provide assistance to my
4 attorneys, including discussing the case with them on numerous occasions and providing them
5 with documents and information. I have spent a significant amount of time in connection with
6 the assistance/prosecution of the claims in this lawsuit. I estimate that I spent approximately
7 30-35 hours in connection with the assistance/prosecution of the claims in this lawsuit. This
8 includes the following:

- 9 a. Meeting with my attorneys to discuss this case and the facts involved on
10 numerous occasions, including numerous telephonic meetings at various
11 stages of the lawsuit;
- 12 b. Gathering documents related to this case;
- 13 c. Reviewing the complaint and other documents, including my declaration
14 and the settlement agreement;
- 15 d. Regularly providing information to my attorneys and responding to any
16 questions;
- 17 e. Testifying in my deposition;
- 18 f. Reviewing and signing the settlement agreement.

19 9. I understand that this action was brought on behalf of other similarly situated
20 employees, and that I am acting as a representative for the Settlement Class. As a Class
21 Representative, I understand that it is my responsibility to act in the best interests of the
22 Settlement Class.

23 10. I do not have any relationship of any kind with Watsonville Law Center.

24 11. I have and continue to be willing to assist in the investigation of this matter as
25 well as make myself available for trial or any further proceedings in this matter as required to
26 represent the interests of the Class. I also understand my duties and responsibilities to the
27 proposed Class and will carry out those duties as necessary.

28 12. I have discussed the terms of the Settlement Agreement with my attorneys, and

1 based on the information provided, I believe the settlement to be fair, adequate, and reasonable
2 for myself and for the entire Settlement Class.

3 13. I understand that I could have been liable for Defendant's legal costs had
4 Defendant prevailed. I also understand that this lawsuit was filed in the public court records,
5 which may affect my ability to obtain future employment.

6 14. In connection with the settlement, I also executed a general release of any and all
7 claims, known and unknown, including a waiver of Civil Code § 1542, which was not required
8 of other Settlement Class Members.

9 15. My first language is Spanish, and I speak no English. Jackie Mireles orally
10 translated the contents of this declaration from English to Spanish for me before I signed it.
11 Ms. Mireles speaks my language fluently and appeared to have no difficulty understanding
12 me. Likewise, I had no difficulty understanding Ms. Mireles. Ms. Mireles read the entire
13 contents of this declaration to me in Spanish before I signed it, and the translation she read to
14 me was a true and accurate recitation of the testimony I wish to present to the court.

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

17 Executed on this 12th day of October 2023, at Salinas, California.

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