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15 Attorneys for Plaintiff,
16 YANNET JIMENEZ on behalf of herself and all similarly situated employees

17 **SUPERIOR COURT OF CALIFORNIA**

18 **COUNTY OF MONTEREY**

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

21 v.

22 SAMBRAILO PACKAGING; and DOES 1
23 through 50, inclusive,

24 Defendants.

Case No. 20CV003281

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

Date: June 30, 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. I understand that this action was brought on behalf of all employees in the
4 State of California, and that I am acting as a representative for the Settlement Class. As a class
5 representative, I understand that it is my responsibility to act in the best interest of the
6 Settlement Class. I agree that I will not put my own interests ahead of that of the Settlement
7 Class. Moreover, I am not aware of any conflicts that exist between my interests and the
8 interests of the Settlement Class that would impair or affect my ability to serve as
9 representative for the Settlement Class.

10 9. I have spent a significant amount of time discussing this matter with my
11 attorneys on many occasions and explaining my understanding of Defendant's practices. To
12 date, I have performed a number of tasks in my role as the representative. This includes the
13 following:

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

24 In total, I have spent approximately 30-35 hours in connection with this lawsuit.

25 10. I have discussed the terms of the settlement with my attorneys, and based on
26 the information provided, I believe the settlement to be fair, adequate, and reasonable for
27 myself and for the Settlement Class.

28 11. I am proud of the result and accomplishment of this lawsuit. I feel that it is a

1 positive accomplishment and understand that other people who worked for Defendant will
2 benefit because of the actions that I have taken.

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

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct. Executed on June 5, 2023, at Salinas, California.

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13 Yannet Jimenez
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