

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

JEANNETTE SALAZAR, 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 Act,

Plaintiff,

v.

AMERISOURCEBERGEN DRUG
CORPORATION, a Delaware corporation;
and DOES 1 through 100, inclusive,

Defendant.

Case No.: 34-2021-00301017-CU-OE-GDS

Honorable Jill H. Talley
Department 23

CLASS ACTION

**DECLARATION OF JEANNETTE
SALAZAR IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: February 23, 2024
Time: 10:30 a.m.
Department: 23

Complaint Filed: May 18, 2021
FAC Filed: August 16, 2023
Trial Date: None Set

DECLARATION OF JEANNETTE SALAZAR

I, Jeannette Salazar, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff 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 AmerisourceBergen Drug Corporation (“AmerisourceBergen”) as an hourly-paid Pharmacy Tech from March 2009 to May 2022. I decided to seek legal advice about my work experiences with AmerisourceBergen 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 AmerisourceBergen was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **3 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **6 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **10 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with AmerisourceBergen, reviewing documents with my attorneys, answering questions, and providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from AmerisourceBergen. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **5 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, describing policies, practices, and procedures of AmerisourceBergen.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement agreement and about **3 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

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, I respectfully request that the Court award me an enhancement payment in the amount of \$5,000.00 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.

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

02/07/2024

Executed this ____ day of February 2024, at Redlands, California.

Electronically Signed 2024-02-08 01:34:11 UTC - 76.178.121.199
Jeannette Salazar
Nintex AssureSign® #9558e13-abc2-4312-b98b-b1100014aaf6a

Jeannette Salazar