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Attorneys for DAISY SOLANO,
on behalf of herself, all others similarly situated,
and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

DAISY SOLANO, on behalf
of herself and all others similarly situated, and
on behalf of the general public,

Plaintiff,

v.

GOODWILL SERVING THE PEOPLE OF
SOUTHERN LOS ANGELES COUNTY,
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV19280

**DECLARATION OF DAISY SOLANO
IN SUPPORT OF HER MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Action Filed: May 25, 2021
Trial Date: None Set

1 I, Daisy Solano, hereby declare under penalty of perjury as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I
3 could and would competently testify thereto, except as to those matters stated upon
4 information and belief, and as to those matters, I believe them to be true.
- 5 2. I am a named Plaintiff in the above-captioned lawsuit, and I submit this declaration
6 in support of Plaintiff's Motion for Approval of PAGA Settlement.
- 7 3. I worked for Goodwill, Serving the People of Southern Los Angeles County
8 ("Defendant") as an hourly, non-exempt assistant manager in California during the
9 PAGA Period.
- 10 4. I originally decided to contact an attorney because I felt that some of Defendant's
11 policies and practices violated the law.
- 12 5. Based on my communications with other employees, what I witnessed while
13 working for Defendant, and my personal experience as an employee for Defendant,
14 it was my belief that my experiences were not unique to me, but were shared by all
15 of the non-exempt, hourly managers and assistant managers that worked for
16 Defendant.
- 17 6. I have been in regular contact with my attorneys throughout the prosecution of this
18 case and have been kept apprised of all aspects of the case. Throughout the litigation,
19 I have always been available to provide my attorneys with helpful information for
20 this lawsuit.
- 21 7. I understood that a large amount of work would be required of me as a named
22 representative, and I was willing to and did engage in this work. I had regular
23 discussions with my attorneys, provided my attorneys with information and
24 documents from my employment with Defendant, responded promptly to my
25 attorneys' various communications regarding this matter, and reviewed and analyzing
26 the settlement agreement and settlement papers.

1 8. Defendant sent me discovery which I had to respond to. In doing so, I had multiple
2 conversations with my attorneys about the answers to these discovery requests. When
3 my attorneys sent me the drafted responses, I carefully reviewed them and let them
4 know if anything that needed to be changed.

5 9. I also sat for my deposition on March 8, 2022. My deposition lasted most of day.
6 Prior to my deposition, I met with my attorneys on three occasions to prepare for my
7 deposition. Each of these meetings took a few hours.

8 10. Although I did not attend the mediation in person, I was available via phone. During
9 the settlement negotiations, my attorneys continually communicated and explained
10 every part of the negotiation process. Having been fully informed and advised by my
11 attorneys as to the strengths and risks associated with further litigation, I gave my
12 consent to settle with Defendant for the gross settlement amount of \$205,000, which
13 I find to be fair and reasonable.

14 11. As part of the settlement agreement, I agreed to a general release of my claims against
15 Defendant. This includes a release for my individual wage and hour claims. I believe
16 the requested \$10,000 for my agreeing to this release, which is broader than the claims
17 being released by the other aggrieved employees, who can still bring their own claims
18 against Defendant, is fair and reasonable.

19 12. I initiated this lawsuit on behalf of myself and the other aggrieved employees because
20 I wanted to fix what I perceived as problems affecting all of us. From the very
21 beginning, I understood that I was participating in this case, not only for my own
22 benefit, but for the many past and present non-exempt employees.

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1 13. While I truly believe that I was doing the right thing in pursuing this case, I do believe
2 that I have paid a price for the greater good of other employees, who will now obtain
3 some relief through the terms of the proposed settlement.

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

6 Dated: 5/6/2022 | 2:43:12 PM PDT

7 By:  DAISY SOLANO
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