

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Misty M. Lauby, Esq. [CSB No. 243009]
misty@lmlfirm.com
LAUBY, MANKIN & LAUBY, LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff, on a Representative Basis and on behalf of the Punitive Class

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

KARINA MORALES, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

VPET USA, LLC, a Delaware Limited
Liability Company; WORKFORCE
PERSONNEL, INC., a California
Corporation; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: CIVSB 2108161
*[Assigned to Hon. Judge David Cohn, Dept
S26, for all purposes]*

**DECLARATION OF KARINA
MORALES IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

I, Karina Morales, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of
all matters stated herein and could competently testify thereto.

2. I make this declaration in support of the motion for final approval of the class
action settlement reached in this matter. As discussed herein, I believe that the settlement is fair
and reasonable and constitutes a fair resolution of the claims alleged.

3. I was employed by Defendants from approximately 2018 through November
2020. During my employment for Defendants, there were several issues that concerned me and

1 which I thought did not comply with California law, such as not being paid properly and not
2 getting proper meal periods and rest breaks. Even though I believed the company might be
3 violating California law, I did not take action while employed because I did not want to risk
4 losing my job or being treated differently as a whistleblower. However, in late 2020, I was
5 terminated shortly after reporting that I believed I had a COVID-related illness (a termination
6 which I believed to be improper and potentially discriminatory). After that happened, and even
7 though I was unsure if I wanted to bring a lawsuit because of the risk of stepping forward as a
8 whistle blower (since this could jeopardize my livelihood in the industry and make it difficult to
9 find future jobs), I retained Lauby, Mankin & Lauby LLP to move forward with a case because I
10 did not think that myself or the other employees were being treated correctly.

11 4. After retaining my attorneys, I understood that I had two options: I could pursue
12 my individual case – including claims for discrimination and wrongful termination (as discussed
13 below) – and attempt to maximize my personal recovery, or I could bring a class/representative
14 action and put the interests of the class ahead of my own. The decision of whether to bring my
15 individual claims or to bring a class action put me in a tough spot, because on the one hand, I
16 wanted to hold the company accountable for how they treated me and, on the other hand, I
17 wanted to help other employees that were not paid correctly. And I knew that, if I wanted to
18 bring a class action, I would need to put the interests of the class first to better serve the class. In
19 the end, in the interest of helping all employees that were subjected to the wage violations, I
20 decided to help everyone by bringing a class/representative action.

21 5. Since first initiating this action, I estimate that I have spent at least forty-five (45)
22 hours engaged in activities to benefit the class. I have assisted my attorneys in numerous ways,
23 including helping to explain and discuss the company's practices and their general practices and
24 procedures, and locating and analyzing company documents. These efforts occurred through
25 telephone conferences with Class Counsel, telephone conferences, letters, and email
26 communications. I also assisted in preparation for mediation and helped obtain a positive result
27 for the class.

28 / / /

6. Moreover, in bringing this case, I was concerned that I could be “blackballed” as a whistleblower, and this was a substantial risk that weighed heavily on my mind every day, leading to substantial anxiety and stress.

7. For the reasons stated above, I respectfully request that the Court approve the agreed-upon service award.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 11, 2022, at Rialto, California.

By: Karina Morales
Karina morales (Oct 11, 2022 22:03 PDT)

Karina Morales