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Attorneys for Plaintiff and the aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

CRISTINA GUZMAN, an individual, on
behalf of herself and others similarly situated,

PLAINTIFF,

v.

RANDSTAD US, LLC; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

Case No. 21CV380800

[Case Assigned for All Purposes to Hon.
Theodore C. Zayner in Dept. 19]

**SUPPLEMENTAL DECLARATION OF
CRISTINA GUZMAN IN SUPPORT OF
FINAL APPROVAL OF PAGA
SETTLEMENT**

Date: October 23, 2024
Time: 1:30 PM
Dept.: 19

Complaint Filed: April 28, 2021
Trial Date: None Set

DECLARATION OF CRISTINA GUZMAN

I, CRISTINA GUZMAN, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the matter of CRISTINA GUZMAN, an individual, on behalf of herself and others similarly situated, v. RANDSTAD US, LLC., and DOES 1 thru 50, inclusive, Santa Clara County Superior Court, Case No. 21CV380800. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claim and the claims of my co-workers, and in support of my qualifications as the named Plaintiff. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as an employee of Defendant Randstad US, LLC. ("Randstad" or "Defendant").

3. As an employee of Defendant, I contend that I regularly failed to receive all wages and/or overtime, routinely being required to undergo temperature and security checks while off the clock, and being routinely subjected to Defendant's meal period rounding policy. Also, based on my heavy workload, I regularly did not receive thirty (30) minute uninterrupted meal periods within the first five (5) hours of my shift when working five hours or more. Lastly, I believe that I was not paid all wages at the time of termination.

4. I have spent significant time throughout this class action working with Class Counsel. Before filing this action on April 28, 2021, I researched and identified Counsel that I believed had extensive experience with these types of employment claims and could best represent the interests of the aggrieved employees. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Randstad and provided all relevant employment documents in my possession to produce in formal discovery. In addition, I was deposed for approximately 6 hours on October 24, 2023, and made myself available to attend a full-day remote mediation on January 9, 2024. In connection with my deposition and the mediation, I participated in discussions

with PAGA Counsel and shared my knowledge and insights in order to help obtain a favorable settlement.

5. I estimate the total time spent in connection with this matter is approximately 50-60 hours.

6. I received a separate, individual settlement payment from Defendant in exchange for a general release and dismissal of my individual Labor Code claims pending in arbitration. I signed a confidential individual settlement agreement.

7. Throughout the entirety of this litigation, I have maintained regular contact with PAGA Counsel and assisted in any way possible providing information and making myself available as needed.

8. I was aware that by helping to initiate this lawsuit, my name would become known and it was possible that my involvement in this matter could make it more difficult for me to obtain employment in this field. Regardless, I believed it was important to proceed with this matter on my behalf and on behalf of all others who were subject to the same problems during their employment with Randstad.

9. Based upon my participation in this case, I understand the merits of this settlement and I strongly support the settlement and believe it is fair and reasonable, and in the best interest of the aggrieved employees. I believe this Settlement will benefit the aggrieved employees.

10. It is my opinion that a fair and adequate Class enhancement for me as a named Plaintiff is \$5,000.00. I believe that it is fair and reasonable in view of all of the work I have performed in my role as a named Plaintiff. As a named Plaintiff, I actively participated in all stages of the litigation as detailed above and have always maintained the best interest of the aggrieved employees while performing my named Plaintiff duties.

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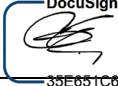
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct.

3 Executed this 01 day of October, 2024 at San Jose
4 California.

5 DocuSigned by:
6 
7 33E651C667BD4F4...
8 Cristina Guzman

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On October 8, 2024, I served all interested parties in this action the following documents described as: **SUPPLEMENTAL DECLARATION OF CRISTINA GUZMAN IN SUPPORT OF PLAINTIFF'S MOTION FOR REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Elizabeth J. MacGregor
emacgregor@seyfarth.com
SEYFARTH SHAW LLP
560 Mission Street, 31st Floor
San Francisco, California 94105

Daniel C. Whang
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SEYFARTH SHAW LLP
2029 Century Park East, Suite 3500
Los Angeles, California 90067

SEYFARTH SHAW LLP
Jeffrey A. Nordlander
jnordlander@seyfarth.com
400 Capitol Mall, Ste 2350
Sacramento, CA 95814-4428

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 8, 2024, at Encino, California.



Michelle Tanzer