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Attorneys for Plaintiffs JESSICA VASQUEZ and YANETH RODRIGUEZ MELGAR in a Representative capacity only, and on behalf of other members of the general public similarly situated,

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF CONTRA COSTA

JESSICA VASQUEZ and YANETH
RODRIGUEZ MELGAR, in a Representative
capacity only, and on behalf of other members of
the general public similarly situated,

Plaintiff,

v.

SALKHI FAMILY HOLDINGS, INC., a
California Corporation; SALKHI
PETROLEUM, INC., a California Corporation;
and DOES 1-10, inclusive.

Defendants.

CASE NO. MSC21-02223

**DECLARATION OF YANETH RODRIGUEZ
MELGAR IN SUPPORT OF PLAINTIFF'S
MOTION RE: UNOPPOSED PAGA
APPROVAL**

Date:

Time:

Dept.: 12

Judge: Hon. Edward G. Weil

Firmado por:

Yaneth Rodriguez Melgar

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Declaration of Yaneth Rodriguez Melgar

I, Yaneth Rodriguez Melgar, declare as follows:

1. I am a named Plaintiff in the above-captioned matter. I make this declaration in support of Plaintiff's Unopposed Motion for Approval of PAGA Settlement.
2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a witness I could and would do so.
3. To my recollection, I personally met with my Attorneys on at least 3 occasions. Several of those meetings lasted in excess of 2 hours.
4. During these meetings, I would review and explain numerous documents turned over by Defendants from my employment. I would also explain my (as well as others') role during work. I also helped identify numerous other employees who could support the claims I was making in this lawsuit. I contacted many of these individuals myself to verify their willingness to participate.
5. I also spoke with my attorneys on the phone on at least 10 other occasions.
6. I also spent significant time reviewing the settlement documentation and discussing the settlement with my attorneys.
7. In total, I estimate that I spent at least 22 hours related to the above mentioned tasks directly working with my attorneys. I also spent at least another 8-10 hours of my own time gathering evidence and outlining issues that I later shared with my attorneys.
8. When I decided to move forward with this case, I was counseled by my attorneys of the potential stigma of being a Class Representative in a representative action, as this is a publicly filed lawsuit.
9. I was also advised when I brought this case that had we lost, I could have been personally liable for paying all of Defendants' costs. I was further advised this could be well into the tens of thousands of dollars on this type of case.

10. Despite these risks I was committed to achieving a settlement that would benefit all employees working for Salkhi as hourly employees.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 30th day of May, 2025 at Richmond, California.

Firmado por:
Yaneth Rodriguez Melgar
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YANETH RODRIGUEZ MELGAR