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Attorneys for Plaintiff Salina Gallegos

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

SALINA GALLEGOS, individually, and on  
behalf of other members of the general public  
similarly situated;

Plaintiff,

vs.

CENTRAL VALLEY BUILDERS SUPPLY,  
an unknown business entity; and DOES 1  
through 100, inclusive,

Defendants.

SALINA GALLEGOS, individually, and on  
behalf of other aggrieved employees pursuant  
to the California Private Attorneys General  
Act;

Plaintiff,

vs.

CENTRAL VALLEY BUILDERS SUPPLY,  
an unknown business entity; and DOES 1  
through 100, inclusive,

Defendants.

Case No.: 21CV001191 (Lead Case)  
Consolidated Case No.: 21-cv-001446

Honorable Scott L.R. Young  
Department B

**CLASS ACTION**

**DECLARATION OF SALINA  
GALLEGOS IN SUPPORT OF  
PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
AND PAGA SETTLEMENT**

Hearing Date: June 20, 2025  
Hearing Time: 8:30 a.m.  
Department: B

Complaint Filed: August 16, 2021  
Trial Date: None Set

**DECLARATION OF SALINA GALLEGOS**

I, Salina Gallegos, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned cases. 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 Central Valley Builders Supply ("Defendant") from approximately July 2014 to approximately April 2020 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendant 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 Defendant was held accountable for not properly compensating its employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC 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, class representative, and a PAGA representative. Prior to commencing the cases, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

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

4. In addition, I assisted my attorneys in preparing responses and amended responses to Defendant's Request for Production of Documents (Set One) and producing responsive documents.

1           5.       Throughout this matter, I was available to answer any questions my attorneys had,  
2 and available to speak and meet with my attorneys whenever they needed me. I responded to them  
3 as quickly as possible and gave them as much information and identified as many documents as I  
4 could. I spent time speaking with my attorneys about the cases, identifying potential witnesses,  
5 providing my attorneys with documents and information concerning the cases, and also describing  
6 policies, practices, and procedures of Defendant.

7           6.       As far as the settlement is concerned, I was available to review documents and  
8 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the  
9 Settlement Agreement and discussed the questions I had regarding the potential settlement with my  
10 attorneys before signing the settlement papers.

11          7.       I understand that a settlement has been reached in my case and what my duties and  
12 responsibilities are as a class and PAGA representative. For example, I am aware that, the Court  
13 certified a class for settlement purposes and appointed me as the representative of the class and my  
14 attorneys as counsel for the class. I also understand that my duties have included checking in on,  
15 monitoring, and conferring with my attorneys to facilitate the notice and settlement administration  
16 process, and to provide information that the Court needs in order to assess whether the settlement  
17 is fair, reasonable, and adequate.

18          8.       I believe that I have done everything that my attorneys have asked of me and have  
19 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class  
20 members and the State of California with respect to aggrieved employees. I have volunteered to  
21 represent and champion the interests of many other people with similar claims and injuries because  
22 of the importance of the cases and the necessity that all class members and aggrieved employees  
23 benefit from the lawsuits equally. As a class representative, I have and continue to represent the  
24 interests of all members of the class in litigation to recover relief for the class. As an hourly-paid  
25 non-exempt employee of Defendant who was subject to the same policies, practices, and  
26 procedures as the other members of the class, I have claims that are typical of those of the class. I  
27 consider the interests of the class just as I would consider my own interests. I understand that I  
28 may need to put the interests of the class before my own interests, although I have no reason to

1 believe that my interests are in conflict with the interests of the class. I understand that any  
2 resolution of the lawsuit is subject to court approval and must be in the best interest of the class as  
3 a whole. I have participated, and continue to participate, in the lawsuit as necessary. I have actively  
4 followed and monitored the progress of the lawsuits, and have taken steps to make sure that the  
5 litigation is prosecuted by the skilled and effective attorneys that I have retained.

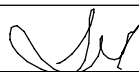
6 9. I think my efforts helped to get the result obtained in these matters, and as a  
7 potential class and PAGA representative, I respectfully request that the Court award me an  
8 enhancement award for my efforts in pursuing and participating in these matters. Taking into  
9 consideration the time that I have dedicated to these matters, I believe that this amount is  
10 reasonable.

11 10. I am not related to anyone associated with Lawyers for Justice, PC.

12 11. I have not entered into any undisclosed agreements, nor have I received any  
13 undisclosed compensation in this matter. The only compensation I will receive is whatever amount  
14 the Court awards as an enhancement award, my share of the settlement as a class member and  
15 aggrieved employee, and a separate payment pursuant to the individual Settlement Agreement and  
16 General Release for, *inter alia*, my general release and waiver of claims.

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

19 Executed on this \_\_\_\_ day of \_\_\_\_\_ 2025, at American Canyon, California.  
20 05/23/2025

21 Electronically Signed  2025-05-23 19:25:03 UTC - 99.91.15.10  
Hintex AssureSign® e7b552-a7e2-479f-9db5-62a2018698a2

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