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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SOLANO

MARIA SOLEDAD RANGEL
MERCADO, individually and on behalf of
all others similarly situated;

Plaintiff,

vs.

NORTH BAY DISTRIBUTION, INC., a
California Corporation; CHARTWELL
STAFFING SERVICES, INC., a New
York Corporation; and DOES 1 through
20, inclusive;

Defendants.

Case No.: FCS057328
*[Assigned to Hon. Tim P. Kam, Dept 7, for all
purposes]*

**DECLARATION OF PLAINTIFF MARIA
SOLEDAD RANGEL MERCADO IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1 I, Maria Soledad Rangel Mercado, state and declare:

2 1. I am the Plaintiff in the above captioned action and have personal knowledge of
3 all matters stated herein and could competently testify thereto. I make this declaration in support
4 of the motion for preliminary approval of the class action settlement. I believe that the settlement
5 is fair and reasonable and constitutes a fair resolution of the claims alleged.

6 2. When I first retained my attorneys (Lauby, Mankin & Lauby and Bokhour Law
7 Group, P.C.) and chose to pursue this case on a class action basis, I understood that I had specific
8 burdens as the "Class Representative," which included: (a) representing the interests of all class
9 members, (2) considering the interests of all class members above my own personal interests, (3)
10 participating actively in the lawsuit, including potential testimony at deposition and trial, and
11 keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that
12 any resolution of the lawsuit is subject to court approval and must be designed in the best
13 interests of the class as a whole.

14 3. Since first initiating this action on behalf of the proposed class, I believe that I
15 have more than adequately performed my duties as a class representative. I have been an active
16 participant in this litigation, including assisting my attorneys in various ways and making myself
17 available when needed. For example, I have assisted my attorneys by compiling and analyzing
18 substantial documentation regarding the claims in this case. I have also helped to explain and
19 discuss the company's practices and their general practices and procedures, locating and
20 analyzing company documents, among others. I have also reviewed all settlement documents and
21 believe that this settlement is fair for the class. Finally, I will continue to take all steps necessary
22 to finalize this settlement and obtain court approval.

24 4. I have no conflicts with the proposed class members and will continue to assist
25 with the litigation and prosecute the case on behalf of the other employees.

26 5. I respectfully request that the court preliminarily approve the service award. As
27 outlined above, I have performed substantial services for the Class and helped obtain a highly
28 beneficial settlement for my fellow employees. And I have also agreed to waive all of my claims

1 against the company as part of this settlement and in exchange for the service award – which
2 goes well beyond the release given by other class members. At the final approval stage, I will
3 submit an additional declaration setting forth all the work I did for this case, including an
4 estimated number of hours spent assisting the Class and my attorneys.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed on 2/5/2024, at Long Beach, California.

7
8 By:

DocuSigned by:
Maria S Rangel
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9 Maria Soledad Rangel Mercado
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