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Attorneys for Plaintiff and the proposed class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

DANIEL ALCARAZ, an individual, on behalf
of himself and others similarly situated

PLAINTIFF,

v.

GRIFOLS BIOLOGICALS INC.; and DOES 1
thru 50, inclusive,

DEFENDANTS.

CASE NO. 21STCV42719
[Case Assigned for All Purposes to Hon.
Lawrence P. Riff in Dept. 7]

**DECLARATION OF DANIEL ALCARAZ
IN SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: April 9, 2024
Time: 11:00 A.M.
Dept.: 7

Complaint Filed: November 19, 2021
FAC Filed: January 24, 2022
Trial Date: None Set

DECLARATION OF DANIEL ALCARAZ

I, Daniel Alcaraz, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

1. I am a former employee of Defendant Grifols Biologicals Inc. (“Grifols” or “Defendant”) as a non-exempt employee. I worked as a manufacturing technician for Grifols Biologicals from about September 2015 to June 2021.

2. In my role as a manufacturing technician, I received incentive pay in the same pay period as receiving overtime and meal/rest break premium pay.

2. I understand that I am representing other employees and I believe that I am able to represent them well.

3. Before filing this action in November 2021, I researched and identified Counsel that I believed could best represent the interests of the Class Members. 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 Grifols Biologicals, Inc. and provided all relevant employment documents in my possession. The lawsuit was filed on November 19, 2021.

4. Throughout the case, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys’ various communications regarding this matter; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

5. I also had my deposition taken by an attorney for Grifols and had to miss work in order to be present.

1 6. I have worked to actively represent the other Class Members and their interests.

2 7. I have always kept the Class Members interests at heart in this litigation.

3 8. I am prepared to continue assisting with this litigation and am committed to
4 achieving the best possible results for the Class.

5 9. I believe that the class action settlement obtained on behalf of the Class is fair and
6 reasonable in light of the issues involved in this case. As mentioned above, I reviewed and
7 discussed the Agreement with my attorneys and asked them questions about it to ensure that I
8 understood its terms and what it would mean for all of the class members.

9 10. I believe that I have fairly represented the absent Class and request that the Court
10 finally approve this settlement.

11 11. I am not aware of any conflicts of interest that prevent me from being confirmed
12 as Class Representative for purposes of settlement in this Action. I am not related in any way to
13 my attorneys or to any other member of the firm that is representing me. I have no business
14 dealings or other involvement beyond this lawsuit and this representation. I have not been
15 promised any money or inducement to serve as Class Representative in this Action. I am already
16 a representative of the certified class in this matter.

17 12. It is my opinion that the settlement agreement provides for a fair and adequate
18 enhancement for me as a Class Representative, in the amount of \$5,000.00. I believe that this is
19 fair and reasonable in light of all of the work that I have performed in my role as Class
20 Representative. As Class Representative, I have actively participated in all stages of the
21 litigation, as detailed above, and have always maintained the best interests of the Class while
22 performing my Class Representative duties.

23 ///

25 ///

27 ///

Executed this 11th day of March, 2024 at Los Angeles, California.

DocuSigned by:

 Daniel Alcaraz

(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 March 13, 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF DANIEL ALCARAZ IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Daniel J. McQueen, Esq.
daniel.mcqueen@afslaw.com
ArentFox Schiff
555 W 5th St Fl 48
Los Angeles, CA 90013

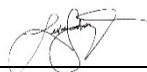
☐ **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **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.

☒ **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 below email address(es).

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

Executed on March 13, 2024, at Chino, California.



Leslie Sanchez