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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. Amy
D. Hogue in Dept. 7]

**DECLARATION OF PLAINTIFF DANIEL
ALCARAZ IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS SETTLEMENT**

Date: November 6, 2023

Time: 3:00 PM

Dept.: 7

Complaint Filed: November 19, 2021

Trial Date: None Set

1 **DECLARATION OF PLAINTIFF DANIEL ALCARAZ**

2 I, Daniel Alcaraz, state and declare as follows:

3 1. I am a competent adult, over the age of eighteen and the Class Representative
4 Plaintiffs in the matter of *Alcaraz v. Grifols Biologicals Inc.* Los Angeles County Superior Court,
5 Case No. 21STCV42719. The foregoing is based upon my personal knowledge and, if called as a
6 witness, I could and would competently testify thereto. I am making this sworn declaration in
7 support of my claims and the claim of my co-workers, and in support of my qualifications as Class
8 Representative. If called as a witness, I could and would competently testify as to the truth of the
9 matters set forth herein.

10 2. I worked as a manufacturing technician for Grifols Biologicals from about
11 September 2015 to June 2021.

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

14 4. I have spent significant time throughout this class action working with Class
15 Counsel. Before filing this action in November 2021, I researched and identified Counsel that I
16 believed could best represent the interests of the Class Members. I also assisted the attorneys with
17 investigation and gathering of information including discussing my work experience and the
18 experience of others that I had observed while working for Grifols Biologicals, Inc. and provided
19 all relevant employment documents in my possession.

20 5. Throughout the entirety of this litigation, I have maintained regular contact with
21 Class Counsel and assisted in any way possible by providing information and making myself
22 available as needed. I also had my deposition taken by an attorney for Grifols and had to miss work
23 in order to be present.

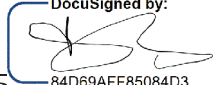
24 6. I was aware that by helping to initiate this lawsuit, my name would become known
25 and it was possible that my involvement in this matter could make it more difficult for me to obtain
26 employment in this field. Regardless, I believed it was important to proceed with this matter on
27 my behalf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

1 7. Based upon my participation in this case, I understand the merits of this settlement
2 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
3 of the class. I believe this Settlement will benefit the Class.

4 8. I do not have any conflict of interest that would prevent me from adequately
5 representing the class.

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

11
12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct. Executed this 17 day of August, 2023
14 at Los Angeles, California.

15
16 DocuSigned by:

17 84D69AFF85084D3...
18 Daniel Alcaraz
19 Declarant
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(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 August 17, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF PLAINTIFF DANIEL ALCARAZ IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

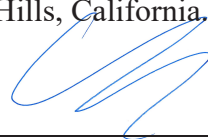
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333 South Hope Street, 43rd Floor
Los Angeles, CA, 90071-1422

[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 THROUGH CASE ANYWHERE: On interested parties set forth on the attached service list.

[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 August 17, 2023, at Woodland Hills, California.



Michelle Tanzer