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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

ROEL GALICIA, individually, and on behalf
of other members of the general public
similarly situated,

Plaintiff,

v.

JIF-PAK MANUFACTURING, LLC, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 37-2020-00005233-CU-OE-CTL

Honorable Kenneth J. Medel
Department C-66

CLASS ACTION

**DECLARATION OF ROEL GALICIA IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class and
Representative Action Settlement;
Declaration of Proposed Class Counsel
(Yasmin Hosseini); and [Proposed] Order
filed concurrently herewith]

Date: February 10, 2023
Time: 9:30 a.m.
Department: C-66

Complaint Filed: January 29, 2020
Trial Date: None Set

DECLARATION OF ROEL GALICIA

I, **Roel Galicia**, 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 case. 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 Jif-Pak Manufacturing, LLC (“Jif-Pak”) in an hourly-paid and non-exempt position from August 2017 to March 2018. I decided to seek legal advice about my work experiences with Jif-Pak. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Jif-Pak was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 5 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours 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 eventually a PAGA representative.

3. I have spent over 18 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff and class and PAGA representative, which included gathering documents concerning my employment with Jif-Pak, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Jif-Pak. 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. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least 10 additional hours speaking with my attorneys about the

1 case, identifying potential witnesses, providing my attorneys with documents and information
2 concerning the case, and also describing policies, practices, and procedures of Jif-Pak.

3 5. As far as the settlement is concerned, I was available to review documents and
4 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
5 agreement and about 4 hours asking questions and discussing the potential settlement with my
6 attorneys before signing the settlement agreement.

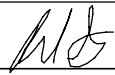
7 6. I believe that I have done everything that my attorneys have asked of me and have
8 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
9 and the State of California. I think my efforts helped to get the result obtained in this case, and
10 as a class and PAGA representative, I respectfully request that the Court award me an
11 enhancement payment in the amount of \$7,500.00 for my active participation in this case.
12 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
13 reasonable.

14 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as an enhancement payment, as well as my share of the settlement as a class
18 member and as an aggrieved employee.

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

21 Executed this ^{09/20/2022} ____ day of September 2022, at Bonsall, California.

22 Electronically Signed 2022-09-20 18:31:16 UTC - 172.58.27.177

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23 Roel Galicia