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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

Coordination Proceeding Special Title (Rule
3.550)

TARGET WAGE AND HOUR CASES

Included Actions:

Medina et al. v. Target Corporation
San Bernardino Superior Court, Case No.
CIVSB2209126

Torres v. Target Corporation
Sacramento Superior Court, Case No. 34-
2022-00319715.

Judicial Council Coordination Proceeding
Case No.: JCCP 5259

Assigned for All Purposes To:
Hon. Wilfred J. Schneider, Jr.
Dept.: S-32

**DECLARATION OF JOALDI
GONZALEZ IN SUPPORT OF
SETTLEMENT APPROVAL**

Date: July 3, 2024
Time: 8:30 a.m.
Dept.: S-32

Action Filed: February 23, 2022
Trial Date: None Set

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I, Joaldi Gonzalez, declare as follows:

1. I am an individual over the age of 18 and one of the named plaintiffs in this matter. This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Target Corporation (“Defendant”) as a non-exempt employee from approximately 2016 to approximately June 2022. I was a “Warehouse Worker/Forklift Operator” in Defendant’s Shafter, California warehouse. Throughout my employment with Defendant, my duties included loading and unloading inventory with a forklift, and manually separating inventory for distribution to retail stores.

3. During my employment, Defendant had a practice of staggering employee meal periods so that a portion of employees always remained performing work. As a result, I regularly had to continue working and wait until after I had completed five hours of work before I was provided with a meal period. As with meal periods, I was only authorized and permitted to take a rest period on a staggered rest period schedule, which would be impacted when the warehouse had a high volume of orders. As a result, I was often not authorized or permitted to take rest periods due to work demands. Moreover, even though I regularly worked shifts over 10 hours, Defendant did not provide me with any second meal periods or authorize and permit me to take a third rest period when I worked shifts over 10 hours. Throughout my employment, Defendant paid me various types of bonuses, but when I earned bonus payments in the same time period that Defendant also paid me meal period premiums, rest period premiums, or sick pay, Defendant only paid me my meal period premiums, rest period premiums, and sick pay wages at my base hourly rate of pay. Finally, the warehouse in which I worked often reached extreme temperatures, sometimes reaching over 100 degrees Fahrenheit, which was made even worse because Defendant did not provide any air conditioning or other means of keeping the warehouse temperatures in a reasonably comfortable range.

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1 4. On January 5, 2023, I filed a class action lawsuit against Defendant in Kern
2 County Superior Court, entitled *Joaldi Gonzalez v. Target Corporation*, Case No. BCV-23-
3 100057. I later learned that other employees of Defendant, including Gustavo Medina, had filed
4 a similar action against Defendant before I had filed my lawsuit, which asserts overlapping
5 claims against Defendant. Therefore, I agreed to join this lawsuit as a named plaintiff and
6 dismiss my separate lawsuit in order to proceed collectively.

7 5. When I first filed my lawsuit, I understood that it had the chance to benefit
8 Defendant's other workers by helping them recover money and penalties they were owed. I felt
9 that Defendant was not following the law, and I wanted Defendant to comply with the law and
10 treat its employees fairly. I feel that the other named plaintiffs and I have taken on a greater
11 burden than any of the other class members because we have been actively involved in the
12 litigation since the outset, and because it is our names that are attached to the lawsuit. Although
13 I was aware of the risks associated with filing a public lawsuit, I chose to move forward with the
14 case anyway. Through my efforts, Defendant has agreed to a settlement that will benefit current
15 and former employees of Defendant, and I believe that I should be compensated for carrying the
16 burden of this litigation for the benefit of the other employees.

17 6. I have been actively involved in this case since before it was even filed. Among
18 other things, I searched for relevant documents for use in the lawsuit, provided factual
19 information to my attorneys, had various phone calls with my attorneys to discuss the claims in
20 the lawsuit and Defendant's practices, assisted my attorneys to help them prepare for mediation,
21 reviewed and provided input regarding the settlement in this case, and otherwise assisted my
22 attorneys in moving this case towards resolution. I estimate that I have spent approximately 15
23 to 20 hours in total on these activities.

24 I declare under penalty of perjury under the laws of the state of California and the
25 United States that the foregoing is true and correct. Executed on 04/15/24, 2024 at
26 Wasco, California.

27  Joaldi Gonzalez (Apr 15, 2024 21:11 PDT)

28 Joaldi Gonzalez