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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 MARTHA
FRANCO 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, Martha Franco, 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 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. Because I do not speak or read English fluently, I was interviewed in Spanish for this declaration with the assistance of an interpreter, who reviewed it with me and translated its contents between English and Spanish.

2. I have worked for Target Corporation (“Defendant”) as a Warehouse Worker in Defendant’s Shafter, California warehouse since approximately 2003, and went out on medical leave in approximately March 2020. I returned to work for Defendant on February 17, 2023, but was unable to complete my shift and resumed my medical leave. My duties include packing and unpacking merchandise for distribution to retail stores.

3. During a portion of my employment, Defendant did not provide me with meal periods until after 11:00 a.m., even though my shifts began at 6:00 a.m. Also, even though I regularly worked shifts over ten hours, Defendant did not provide me with any second meal periods, and failed to authorize and permit me to take a third rest period. Further, for a portion of my employment, I had to purchase my own protective gear for work purposes, including gloves, glasses, and ear plugs, but Defendant never reimbursed me for these expenses.

4. I chose to bring this lawsuit because it had the chance to benefit Defendant's workers by helping recover money and penalties they are owed. I felt that Defendant was not following the law, and I wanted Defendant to comply with the law and treat its employees fairly. I feel that the other named plaintiffs and I have taken on a greater burden than any of the other class members because we have been actively involved in the litigation, and because it is our names that are attached to the lawsuit. Although I knew this was a public lawsuit, I chose to move forward with the case anyway. Through my efforts, Defendant has agreed to a settlement that will benefit current and former employees of Defendant, and I believe that I should be compensated for carrying the burden of this litigation for the benefit of the other employees.

1 5. I have been actively involved in this case since I first retained counsel and joined
2 this action as a named plaintiff. Among other things, I searched for relevant documents for use
3 in the lawsuit, provided factual information to my attorneys, had phone calls with my attorneys
4 to discuss the claims in the lawsuit and Defendant's practices, and otherwise assisted my
5 attorneys in moving this case towards resolution. I estimate that I have spent approximately 10
6 to 15 hours in total on these activities.

7 I declare under penalty of perjury under the laws of the state of California and the
8 United States that the foregoing is true and correct. Executed on 04/24/24, 2024 at
9 Bakersfield, California.



Martha Franco (Apr 24, 2024 11:07 PDT)

Martha Franco