

Kane Moon (SBN 249834)
kmoon@moonlawgroup.com
H. Scott Leviant (SBN 200834)
hsleviant@moonlawgroup.com
Mariam Ghazaryan (SBN 341119)
mghazaryan@moonlawgroup.com
Sandy Pham (SBN 352753)
spham@moonlawgroup.com

MOON LAW GROUP, PC
725 S. Figueroa St., Suite 3100
Los Angeles, California 90017
Telephone: (213) 232-3128
Facsimile: (213) 232-3125

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF YOLO – CIVIL DIVISION

JORDON NORRIS, VERONICA GARCIA, and
JAMIL JOHNSON, individually on behalf of
themselves, and on behalf of all others similarly
situated and aggrieved,

Plaintiffs,

vs.

SCHILLING ROBOTICS, LLC, a limited
liability company; FMC TECHNOLOGIES,
INC., a Delaware corporation; EQ TALENT
SOLUTIONS, LLC, a limited liability company;
ROBERT GLOVER, a natural person
(previously identified as DOE 1), and DOES 2
through 10, inclusive,

Defendants.

Case No.: CV2021-2251

*[Assigned for All Purposes to the Honorable
David Rosenberg, Department 14]*

CLASS ACTION

**DECLARATION OF VERONICA GARCIA
REGARDING MOTION FOR APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: May 22, 2025
Time: 9:00 a.m.
Courtroom: Dept. 14
Judge: Hon. David Rosenberg

Action Filed: December 29, 2021
Trial Date: Not Set

DECLARATION OF VERONICA GARCIA

I, VERONICA GARCIA, declare as follows:

1. I am a named Plaintiff in this case. I have personal knowledge of, or am informed and believe, the following facts herein stated. If called as a witness. I could and would testify competently to the following:

JOB DUTIES AND EXPERIENCES

2. I was hired by Defendant SCHILLING ROBOTICS, LLC during the Settlement Class Period. My employment began on or about July 2019 and ended on or about August 2020. I held a job position that is at issue in this case and included within the class.

3. My job duties included work in the SCHILLING ROBOTICS, LLC facility in Davis, California, as a customer service representative.

4. I experienced issues that are raised in this matter while working at SCHILLING ROBOTICS, LLC, including problems with meal breaks, rest breaks, and payment of all wages owed.

DUTIES OF A CLASS REPRESENTATIVE

5. This lawsuit is not an individual lawsuit. It is a proposed class action. I understand that, if approved as a class representative in this matter, I have an obligation to do my best to look out for the interests of other class members, the current and former employees of Defendant SCHILLING ROBOTICS, LLC who I am seeking to represent. I understand that my obligations to the class exist even when the class is certified solely as part of a class action settlement. It is my understanding that, as one part of this duty to the class, I cannot agree to a settlement to benefit myself to the exclusion of the rest of the class members. I have never asked my attorneys to simply settle this matter at any cost. Rather, I have asked them to obtain the best settlement they could within reason, and I believe that they have attempted to do so.

6. This case was filed about four years ago. I have never asked to be relieved from my role as a proposed class representative. To the contrary, I have made myself available whenever my

1 attorneys wanted to discuss aspects of my employment at SCHILLING ROBOTICS, LLC, and I
2 remain committed to seeing this matter through to the end.

3 7. I have conferred with my attorneys about the settlement proposed in this case. I am not
4 an accountant, but I understand the factors and risks that need to be considered when evaluating a
5 settlement.

6 8. Summing it all up in the simplest terms, I am asking to be stand-in for other
7 employees of SCHILLING ROBOTICS, LLC. Because of that, I cannot quit on the Class, and I
8 cannot put myself and my interests before the Class. I accept these duties and request that I be
9 approved as the class representative for purposes of this amended Settlement.

10
11 COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY

12 9. I was an hourly non-exempt employee of Defendant SCHILLING ROBOTICS, LLC and
13 was subject to the same pay structure and rules as all the other hourly non-exempt employees of
14 Defendant SCHILLING ROBOTICS, LLC.

15 10. I am not aware of anything special about me that would raise unique defenses to my
16 claims, as opposed to the claims of the class. I am also not suing for anything unique to me. Rather, my
17 claims are based upon the same facts that relate to the rest of the Class.

18 11. I do not believe that I have any conflicts with Class Members included in this proposed
19 Settlement. I do not have any intention to take any action that would place me in a position that is hostile
20 to other Class Members.

21
22 SERVICE AS A CLASS REPRESENTATIVE

23 12. I believe that were it not for my stepping forward and taking on the duties of protecting
24 the interests of other employees, it is likely that the interests of the class would neither have been
25 prosecuted, nor benefited. To my knowledge, other than the litigation encompassed by this proposed
26 Settlement, there is no other litigation, on a class or individual basis, concerning the claims in this
27 lawsuit. Nor has Defendant pointed to any.

28 13. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to

1 search for information online these days, I will face an increased risk that future employers will
2 discover information about this lawsuit online and have a negative reaction to learning that I sued an
3 employer. This may make it harder for me to obtain future employment or change jobs for a better
4 opportunity.

5 14. I have devoted a substantial amount of my time, both before this lawsuit was filed and
6 also during its litigation to ensure a fair result for the employee class. This involved ongoing
7 communications and participation with my counsel during the course of this case.

8 15. My participation began with bringing certain issues that are involved in this matter to
9 my counsel's attention, and explaining the factual background that was used to prosecute the claims in
10 this case.

11 16. For example, I reviewed documents which I already had, I provided relevant documents
12 to my counsel, and I explained those documents and related facts to my counsel to assist them in their
13 review. I also assisted in identifying potential witnesses, including other employees, who might
14 likewise have been of assistance.

15 17. My efforts continued after suit was filed. For example, I continued to identify
16 employees and other witnesses to counsel, along with other information as to how they could be of
17 potential use in this matter. I also discussed strategy with my counsel.

18 18. I was deposed in this matter and assisted my counsel with responses to written
19 discovery.

20 19. I was available to answer questions for my counsel during the mediation.

21 20. After the mediation, a long-form settlement agreement was negotiated, and I reviewed it
22 with my attorneys as well as I was able to ensure that its terms are likewise fair and adequate.

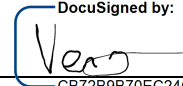
23 21. In sum, I believe I have provided well over 40 hours of my time during the course of
24 this litigation to ensure a good outcome for the best interests of the class.

22. I do not believe that I have any conflicts with Class Members included in this proposed Settlement.

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

Executed on 10/30/2024, at Sparks, Nevada.

DocuSigned by:



VERONICA GARCIA, "Declarant"