

1 Raul Perez (SBN 174687)
Raul.Perez@capstonelawyers.com
2 Roxanna Tabatabaee pour (SBN 260187)
Roxanna.Taba@capstonelawyers.com
3 Ryan Tish (SBN 274284)
Ryan.Tish@capstonelawyers.com
4 Alexander Wallin (SBN 320420)
Alexander.Wallin@capstonelawyers.com
5 CAPSTONE LAW APC
1875 Century Park East, Suite 1000
6 Los Angeles, California 90067
Telephone: (310) 556-4811
7 Facsimile: (310) 943-0396

8 Attorneys for Plaintiff Precious Salgado

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE COUNTY OF SAN BERNARDINO

11
12 PRECIOUS SALGADO, individually, and on
13 behalf of other members of the general public
14 similarly situated, and as an aggrieved employee
pursuant to the Private Attorneys General Act
("PAGA"),

15 Plaintiff,

16 vs.

17 BLOOD BANK OF SAN BERNARDINO
18 AND RIVERSIDE COUNTIES, a California
corporation; and DOES 1 through 10, inclusive,

19 Defendants.
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Case No. CIVSB2305507

Assigned to the Hon. Jessica Morgan

**DECLARATION OF PRECIOUS SALGADO
IN SUPPORT OF MOTION FOR COURT
APPROVAL OF THE PARTIES' PAGA
SETTLEMENT**

Date: October 17, 2024

Time: 8:30 a.m.

Place: Department S26

Complaint Filed: February 27, 2023

Trial Date: None Set

DECLARATION OF PRECIOUS SALGADO

I, Precious Salgado, hereby declare as follows:

1. I am over eighteen years old and unless the context indicates otherwise, I have personal knowledge of the following facts, and if called as a witness, I could and would testify competently to them. I am the named plaintiff in the above-captioned action. I make this declaration in support of the Motion for Court Approval of the Parties' PAGA Settlement.

2. I was employed by Defendant Blood Bank of San Bernardino and Riverside Counties ("Defendant") as an hourly paid, non-exempt Donor Specialist from approximately March 2022 to January 2023. I worked for Defendant at its various donor centers and mobile sites, including Ontario, Riverside, San Bernardino, La Quinta and Hesperia, California. My primary job duties included performing quality control and ensuring all medical devices were operating properly, screening donors, asking donors questions pertaining to health history to determine donation eligibility, completing vital checks, drawing blood, and storing blood.

3. I decided to file this lawsuit because I had a number of grievances against Defendant stemming from its labor policies. These grievances are set forth in detail in the operative Complaint and my letter to California Labor and Workforce Development Agency ("LWDA").

4. Prior to filing the action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendant.¹ During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

5. After retaining my attorneys, I spent considerable time on the phone discussing the facts of my case with my attorneys. I discussed the facts related to my employment with Defendant, including discussing my job duties and responsibilities, my job position, the hours and days I worked, and how I was compensated.

6. When I agreed to represent the LWDA as a deputized private attorney general, I understood it was my duty to be readily available and to participate actively in this case. I knew that I

¹ Although the preservation of my attorney-client privilege requires that I refrain from revealing the specifics of my communications with my attorneys, I understand that the privilege is not waived by stating generally the matters that I have discussed with my attorneys.

1 would be required to review documents, search for documents and produce them to my attorneys,
2 answer written questions, potentially answer oral questions and testify truthfully under oath, and be
3 available to appear in court, if necessary.

4 7. I understood that I needed to maintain awareness of the status and progress of the
5 lawsuit.

6 8. My attorneys provided me with a draft of the Complaint for my review and approval. I
7 closely reviewed the Complaint to ensure accuracy and completeness. Following the filing of the
8 Complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly contacted
9 my attorneys to stay current on the status of the litigation, and to discuss my attorneys' progress in
10 prosecuting the claims.

11 9. I have worked to the best of my ability to prosecute this action on behalf of the LWDA,
12 always considering the interests of the LWDA just as I would consider my own interests. I believe
13 PAGA actions are an important tool to assure compliance with the Labor Code.

14 10. Since initiating this lawsuit until now, I have kept aware of the status of the lawsuit and
15 provided my attorneys with information used by them in the litigation. I have spent large amounts of
16 time and effort pursuing my claims and the claims of the other employees from the time I retained my
17 attorneys to the present date.

18 11. I have carefully reviewed the terms of the proposed settlement. My attorneys explained
19 the specifics of how the settlement would work and I accepted the settlement only after I had spent time
20 evaluating the proposed outcome to assure that it was fair. Based on my attorneys' evaluation and
21 recommendation, and my own review, I believe the settlement is fair and reasonable in light of PAGA's
22 policies and purposes.

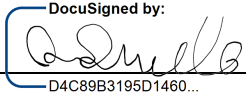
23 12. In summary, over the course of this litigation I have spent a significant amount of time
24 conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement
25 and related documents. I estimate that I have spent between 25 and 35 hours assisting my attorneys in the
26 prosecution of this lawsuit.

27 13. Throughout this case, I have not sought individual benefits from the lawsuit. Rather, I
28 maintained this lawsuit because I wanted to hold Defendant accountable for its unlawful conduct. I

1 believe that I have fulfilled my responsibilities, and I will continue to fulfill those responsibilities, to the
2 best of my ability, until the conclusion of the case.

3 14. I am committed to this case and will continue to make myself available as needed in the
4 settlement process.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing is
6 true and correct. Executed on [Date] 6/26/2024, at [City] San bernardino, California.

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Precious Salgado