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**SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF PLACER**

Case No. S-CV-0050365

CARMEN GARCIA, individually and on
behalf of the State of California, as a private
attorney general, CHANCE MACAIRE and
ARTURO SARMIENTO III, on behalf of
the State of California, as private attorneys
general,

Plaintiffs,

vs.

CALIBER HOLDINGS OF CALIFORNIA,
LLC; CALIBER HOLDINGS, LLC.;
CALIBER HOLDINGS CORPORATION;
PHILLIP TARIN, an individual; and Does
1 through 20, inclusive,

Defendants.

**DECLARATION OF CARMEN
GARCIA IN SUPPORT OF MOTION
TO APPROVE PRIVATE ATTORNEYS
GENERAL ACT SETTLEMENT AND
DISMISS PRIVATE ATTORNEYS
GENERAL ACT CLAIMS WITH
PREJUDICE**

Date:

Time:

Dept.:

Complaint Filed: April 24, 2023

FAC Filed: October 9, 2024

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Aparajit Bhowmik (State Bar #248066)
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Telephone: (858)551-1223 Facsimile: (858) 551-1232
Website: www.bamlawca.com

Attorneys for Plaintiffs

1 I, CARMEN GARCIA, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration,
3 and I am making this declaration on behalf of myself, as a named plaintiff, and in support of
4 Plaintiff's Motion to Approve to Private Attorneys General Act Settlement and Dismiss PAGA
5 Claims with Prejudice.

6 2. I worked for Defendants CALIBER HOLDINGS OF CALIFORNIA LLC,
7 CALIBER HOLDINGS, LLC, CALIBER HOLDINGS CORPORATION (collectively, "Caliber")
8 from approximately November 15, 2021, until February 2, 2023.

9 3. I was subject to all of Caliber's policies and practices that have been alleged as
10 unlawful in the operative Complaint and the PAGA notice sent to the Labor and Workforce
11 Development Agency.

12 4. I have actively participated in the litigation of this case. I have given a detailed
13 account of all the facts related to my employment and the claims asserted in the Complaint. I
14 provided documentation in support of the claims brought against Defendant. I had numerous
15 conferences with my attorneys Timothy Del Castillo and Lisa Bradner of Castle Law: California
16 Employment Counsel, PC and their staff to explain my experience working for Caliber. I estimate I
17 spent at least 35 hours looking for documents and information, organizing and sorting information,
18 in meetings with my attorneys, and in mediation, in order to bring about the resolution of this
19 action.

20 5. My attorneys explained to me the risks and benefits of bringing a representative
21 action. I understood that I took on the risk, both professionally and financially, in pursuing the case
22 as a representative action since my name is on the action.

23 6. I maintained communication with my attorneys throughout the litigation, discussing
24 the facts and policies at issue in the case with Castle Law: California Employment Counsel, PC. I
25 asked questions when I needed clarification about various aspects of this case to make sure I
26 understood the process and to make sure there continually steps taken to advance the interests of the
27 case. I also understood that the recovery in this case was for the benefit of my fellow coworkers, not
28

1 just for me. When my attorneys contacted me asking about more information or documents related
2 to the case, I made myself available and tried to give or obtain any additional information I could.

3 7. I was fully available to my attorneys during the full day mediation in order to assist
4 with providing facts and details needed for mediation.

5 8. I reviewed and signed the final Private Attorney General Act Settlement, and I
6 believe it is fair and reasonable given the facts of the case.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing
8 is true and correct. Executed this 24 day of October in 2024, California.

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10 *Carmen Garcia*
Carmen Garcia (Oct 24, 2024 15:50 PDT)

11 Carmen Garcia
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(Garcia) Garcia Decl ISO PAGA Approval

Final Audit Report

2024-10-24

Created:	2024-10-24
By:	Ron Buchanan (rb@castleemploymentlaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA8GkZuTPI9O7wuR48xLnz5HDXyF41QD1-

"(Garcia) Garcia Decl ISO PAGA Approval" History

-  Document created by Ron Buchanan (rb@castleemploymentlaw.com)
2024-10-24 - 6:40:31 PM GMT- IP address: 207.231.68.167
-  Document emailed to carmenx.garcia@hotmail.com for signature
2024-10-24 - 6:41:05 PM GMT
-  Email viewed by carmenx.garcia@hotmail.com
2024-10-24 - 8:29:31 PM GMT- IP address: 172.226.36.6
-  Signer carmenx.garcia@hotmail.com entered name at signing as Carmen Garcia
2024-10-24 - 10:50:27 PM GMT- IP address: 172.56.168.3
-  Document e-signed by Carmen Garcia (carmenx.garcia@hotmail.com)
Signature Date: 2024-10-24 - 10:50:29 PM GMT - Time Source: server- IP address: 172.56.168.3
-  Agreement completed.
2024-10-24 - 10:50:29 PM GMT