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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SANTA CLARA**

*Cardinal Health Pharmacy Wage and Hour
 Cases*

Included Action:

DEBORAH JONES and MICHAEL
 SALAZAR, individually, and on behalf of other
 members of the general public similarly situated,
 and as aggrieved employees pursuant to the
 Private Attorneys General Act ("PAGA"),

Plaintiffs,

vs.

CARDINAL HEALTH PHARMACY
 SERVICES, LLC, a Delaware limited liability
 company; CARDINAL HEALTH, INC., an
 Ohio corporation; and DOES 1 through 10,
 inclusive,

Defendants.

**JUDICIAL COUNCIL COORDINATION 16
 PROCEEDING NO. 5320**

CASE NO.: 23CV419594

**DECLARATION OF DEBORAH JONES IN
 SUPPORT OF MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION SETTLEMENT**

Date: July 9, 2025
 Time: 1:30 p.m.
 Juge: Theodore C. Zayner
 Place: Department 19

Complaint Filed: July 25, 2023
 Trial Date: None Set

DECLARATION OF DEBORAH JONES

I, Deborah Jones, hereby declare as follows:

1. I am over eighteen years old. 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 a named plaintiff in the above-captioned action, and a representative for the proposed Settlement Class. I make this declaration in support of the Motion for Preliminary Approval of Class Action Settlement.

2. I was employed by Cardinal Health Pharmacy Services, LLC and Cardinal Health, Inc. (“Defendants”) in California as an hourly paid, non-exempt Technician II (Retail Pharmacy) from approximately December 2022 to March 2023. My primary job duties included filling prescriptions, communicating with insurance companies, inputting data into the computer system, and answering phone calls from patients.

3. I decided to file my lawsuit because I had a number of grievances against Defendants stemming from their 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 Defendants.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 Defendants, including discussing my job duties and responsibilities, my job position, the hours and days I worked, and how I was compensated.

6. My attorneys provided me with a draft of the Complaint for my review and approval. I closely reviewed the Complaint to ensure accuracy and completeness. Following the filing of the

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 Complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly contacted
2 my attorneys to stay current on the status of the litigation, and to discuss my attorneys' progress in
3 prosecuting the claims.

4 7. I have worked to the best of my ability to prosecute this action on behalf of the entire
5 class, always considering the interests of the class members just as I would consider my own interests. I
6 believe class actions are an important tool to assure compliance with the law even where an individual's
7 losses may be relatively small. I have no interests which are inconsistent with the interests of the class.

8 8. When I agreed to represent other non-exempt employees performing duties for
9 Defendants in the State of California, I understood it was my duty to be readily available and to
10 participate actively in this case. I knew that I would be required to review documents, search for
11 documents and produce them to my attorneys, answer written questions, potentially answer oral
12 questions and testify truthfully under oath, and be available to appear in court, if necessary.

13 9. I understood that I needed to maintain awareness of the status and progress of the
14 lawsuit.

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

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

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

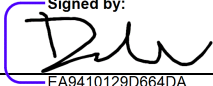
28 13. Throughout this case, I have not sought individual benefits from the lawsuit. Rather, I

1 maintained this lawsuit because I wanted to hold Defendants accountable for their unlawful conduct. I
 2 believe that I have fulfilled my responsibilities, and I will continue to fulfill those responsibilities, to the
 3 best of my ability, until the conclusion of the case.

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

6 15. I have provided informed written consent to the following division of court-awarded
 7 attorneys' fees between Plaintiffs' Counsel: 50% to Capstone Law APC and 50% to Blumenthal
 8 Nordrehaug Bhowmik De Blouw LLP.

9 I declare under penalty of perjury under the laws of the State of California that the foregoing is
 10 true and correct. Executed on [Date] 6/9/2025, at [City] Angwin, California.

11 Signed by:

 12 EA9410129D664DA...
 Deborah Jones