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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**

11 MAURA GRIJALVA LOPEZ, individually,
12 and on behalf of all others similarly situated,

13 Plaintiff,

14 v.

15 DELTA HI-TECH, a California corporation;
16 and DOES 1 through 10, inclusive,

17 Defendants.

Case No.: 23STCV12296

[Assigned for all purposes to the Honorable Laura
Seigle]

CLASS ACTION

**DECLARATION OF MAURA GRIJALVA
LOPEZ REGARDING MOTIONS FOR
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: February 20, 2025
Time: 9:00 a.m.
Courtroom: Dept. 17

Action Filed: August 9, 2023
Trial Date: None Set

DECLARATION OF MAURA GRIJALVA LOPEZ

I, MAURA GRIJALVA LOPEZ, declare as follows:

1. I am a named Plaintiff in this case. I am a former employee of the named defendant, DELTA HI-TECH (“Defendant”). As such, 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 worked for Defendant during the Settlement Class Period. My employment began on or about February 2017 and ended on or about February 2023. I held the job position of buffer that is at issue in this case and included within the class.

3. My job duties included cleaning medical equipment and parts, as needed.

4. I experienced several issues related to wages and working conditions, including working off the clock, some short meal and rest periods, no reimbursement of products I purchased for work purposes, and late final pay and wage statement problems related to those issues.

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 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 one year 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 attorneys wanted to discuss aspects of my employment at Delta Hi-Tech, and I remain committed to seeing this matter through to the end.

7. I have conferred with my attorneys about the settlement proposed in this case. I am not

1 an accountant, but I understand the factors and risks that need to be considered when evaluating a
2 settlement.

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

7 COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY

8 9. I was an hourly non-exempt employee of Defendant and was subject to the same pay
9 structure and rules as all the other hourly non-exempt employees of Defendant.

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

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

16 SERVICE AS A CLASS REPRESENTATIVE

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

22 13. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to
23 search for information online these days, I will face an increased risk that future employers will
24 discover information about this lawsuit online and have a negative reaction to learning that I sued an
25 employer. This may make it harder for me to obtain future employment or change jobs for a better
26 opportunity.

27 14. I have devoted a substantial amount of my time, both before this lawsuit was filed and
28 also during its litigation to ensure a fair result for the employee class. This involved ongoing

communications and participation with my counsel during the course of this case.

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

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

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

18. I spent many hours answering questions from my attorneys before the mediation in this matter. I was available on the day of the mediation to answer any questions that arose.

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

20. In sum, I believe I have provided well over 30 hours of my time during the course of this litigation to ensure a good outcome for the best interests of the class.

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

22. I have no relationship with the Settlement Administrator, Phoenix Settlement Administrators.

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

Executed on 12/30/2024, in California.

Signed by:

Maura Grijalva Lopez

MAURA GRIJALVA LOPEZ, "Declarant"

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the State of California, County of Los Angeles. I am over the age of 18 and not a party to the within suit; my business address is 725 S. Figueroa St., Suite 3100, Los Angeles, CA 90017.

On the date indicated below, I served the document described as: **DECLARATION OF MAURA GRIJALVA LOPEZ REGARDING MOTIONS FOR APPROVAL OF CLASS ACTION SETTLEMENT** on the interested parties in this action by sending ☐ the original [or] ☒ a true copy thereof ☒ to interested parties as follows [or] ☐ as stated on the attached service list:

NIXON PEABODY LLP
David Prager
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Alejandro Castro
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Counsel for Defendant DELTA HI-TECH

☒ **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service CASEANYWHERE. I did not receive an error message.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this **January 23, 2025** at Los Angeles, California.

H. Scott Leviant
Type or Print Name


Signature