Arby Aiwazian (SBN 269827)
Ryan Slinger (SBN 351297)
Alborz Javaheri (SBN 364246)
LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

GERALD HENDERSON, individually, and on behalf of other members of the general public similarly situated and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act; VERONICA DUENAS, individually, and on behalf of other members of the general public similarly situated and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act; GLORIA TORRES, individually, and on behalf of other members of the general public similarly situated;

Plaintiff,

vs.

PHARMAVITE LLC, a California limited liability company; OTSUKA PHARMACEUTICAL CO., LTD., an unknown business entity; OTSUKA HOLDINGS CO., LTD., an unknown business entity; OTSUKA AMERICA, INC., a Delaware corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. 24STCV04979 (Lead Case)
Consolidated Case No. 25CHCV00609

Honorable Elaine Lu
Department 9

CLASS ACTION

DECLARATION OF VERONICA DUENAS IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Date:	December 3, 2026
Time:	10:00 a.m.
Department:	9
Complaint Filed:	February 27, 2024
FAC Filed:	March 17, 2025
SAC Filed:	April 29, 2025
Trial Date:	None Set

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

DECLARATION OF VERONICA DUENAS

I, Veronia Duenas, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Pharmavite, LLC ("Defendant") from approximately April 2022 to present as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to joining the action, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout this matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I

could. I spent time speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the Settlement Agreement and discussed the questions I had regarding the potential settlement with my attorneys before signing the settlement papers.

6. I understand that a settlement has been reached in my case and what my duties and responsibilities are as a class and PAGA representative. For example, I am aware that if the settlement is granted preliminary approval, the Court will certify a class for settlement purposes, and likely appoint me as the representative of the class and my attorneys as counsel for the class. I also understand that my duties will include checking in on, monitoring, and conferring with my attorneys to facilitate the notice and settlement administration process, and to provide information that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate. Further, if any individuals who are potential class members contact me, I will take steps to have them referred to the Court-appointed settlement administrator so that these individuals may receive the necessary information and notice they may be eligible to receive in connection with the settlement and contemplated final approval hearing.

7. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and pursue relief on behalf of other class members and the State of California with respect to aggrieved employees. I have volunteered to represent and champion the interests of many other people with similar claims and injuries because of the importance of the case and the necessity that all class members and aggrieved employees benefit from the lawsuit equally. I understand that as a proposed class representative, and if formally appointed as a class representative, I have and continue to represent the interests of all members of the class in litigation to recover relief for the class. As an hourly-paid non-exempt employee of Defendants who was subject to the same policies, practices, and procedures as the other members of the class, I have claims that are typical of those of the class. I consider the

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

interests of the class just as I would consider my own interests. I understand that I may need to put the interests of the class before my own interests, although I have no reason to believe that my interests are in conflict with the interests of the class. I understand that any resolution of the lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have participated, and continue to participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that I have retained.

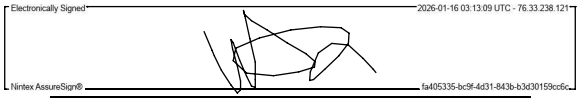
8. I think my efforts helped to get the result obtained in this matter, and as a potential class and PAGA representative, I respectfully request that the Court award me an enhancement award for my efforts in pursuing and participating in this matter, as well as my broader release of claims. Taking into consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

9. I am not related to anyone associated with Lawyers *for* Justice, PC.

10. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and aggrieved employee.

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

Executed on this 01/15/2026 day of _____ 2026, at San Fernando, California.



Veronica Duenas

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203