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Electronically FILED by
Superior Court of California,
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6/08/2026 5:16 PM
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13 Attorneys for Plaintiffs

14
15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16
17 FOR THE COUNTY OF LOS ANGELES

18 Herman Pappoe, Jesse Perez, Amelia Myers,
19 Fatoumata Barry Yapo, individually and on
20 behalf of all others similarly situated and as a
21 private attorney general under the Private
Attorneys General Act, and

22 Plaintiffs,

23 vs.

24 Kite Pharma, Inc., Gilead Sciences, Inc., and
25 Does 1 through 10,

26 Defendants.

Case No. 24STCV02259

CLASS ACTION

(Assigned to Hon. Samantha P. Jessner –
Dept. 7)

**Declaration of Amelia Myers in Support of
Motion for Preliminary Approval of Class
Action Settlement**

Date: September 28, 2026

Time: 11:00 a.m.

Dept.: 7

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**Declaration of Amelia Myers in Support of Motion for Preliminary Approval of Class Action
Settlement**

1
2 I, Amelia Myers, declare:

- 3 1. I am one of the named plaintiffs in this action and am represented by Justin Swartz and Jennifer
4 Davidson of Outten & Golden LLP, Lonnie C. Blanchard III of the Blanchard Law Group, APC,
5 and Jeff Holmes of the Holmes Law Group, APC. Except as otherwise stated, I have personal
6 knowledge of all matters set forth in this declaration.
- 7 2. I was jointly employed in the State of California by Defendants Gilead and Kite as a non-exempt
8 Cell Therapy Specialist II between approximately May 2021 and August 2023 at Kite's El
9 Segundo facility. During my employment, I worked in Kite facility cleanrooms. I was subjected
10 to an off-the-clock app-based COVID screening process, was restricted from de-gowning and re-
11 gowning my PPE during meal and rest breaks and from leaving cleanrooms during meal and rest
12 breaks and subjected to the RSU and incentive award regular hourly rate miscalculation claims,
13 among others. I was also not reimbursed for my internet and cell phone charges.
- 14 3. My counsel has provided me with information regarding class actions, how they work, and what
15 my duties are as a class representative. I agreed to serve as a class representative so that I could
16 seek unpaid wages, penalties, statutory penalties, restitution, interest, costs, and attorney's fees,
17 *inter alia*, on behalf of myself and other employees like me. I understand that as a class
18 representative, I have certain duties and responsibilities to the class and believe that I have fairly
19 represented the interests of all class members during the entire course of this case. I have and
20 will adequately represent the interests of all members of the proposed Settlement Class.
- 21 4. As a class representative, I assumed a fiduciary role to the class. I agreed to (1) consider the
22 interests of the class just as I would consider my own interests and, in general, to put the interests
23 of the class before my own interests; (2) actively participate in the lawsuit, as necessary, by
24 among other things, answering interrogatories, producing documents to Defendants and giving
25 depositions and trial testimony if requested; (3) travel to give such testimony if necessary; (4)
26 recognize and accept that any resolution of the lawsuit by dismissal or settlement is subject to
27 court approval and must be designed in the best interest of the class as a whole; (5) follow the
28

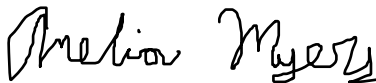
1 progress of the lawsuit and provide all relevant facts to my attorneys; (6) champion many other
2 people with similar claims and injuries because of the importance of the case and the necessity
3 that all class members benefit from the lawsuit; and (7) fight for a resolution in which the
4 individual recoveries to each class member, including me, may be relatively small. I agreed to
5 shoulder all these responsibilities in exchange for a proportionate share of funds made available
6 for distribution to the class. I have never had any guarantee of a class representative
7 enhancement payment.

- 8 5. I have and will consider the interests of the other class members just as I would my own interests
9 and understand that I need to put the interests of the other class members before my own. I have
10 participated, and will continue to participate, in this lawsuit up to and through the time of
11 judgment. I have volunteered to represent the other class members because of the importance of
12 the case and so that other class members can benefit from the enforcement of the law and the
13 savings of time, money and effort that should result if the Court treats this case as a class action.
- 14 6. My claims are like those of the other class members and involve the same issues. I have no
15 conflicts with members of the Settlement Class.
- 16 7. I have actively and diligently participated in the prosecution of this case. The activities I have
17 performed have included, but have not been limited to, obtaining legal counsel, speaking with
18 my legal counsel and members of their staff on many occasions, assisting my counsel in
19 gathering information, as well as making myself available on the day of the mediation. I have
20 also spent time reviewing the Settlement and other case related documents on my own and with
21 my counsel to make sure that the Settlement and other work my attorneys performed are in the
22 best interest of the Settlement Class. Further, I anticipate I will incur additional time even after
23 the Court grants preliminary approval of the Settlement. I believe I have been diligent in acting
24 as a class representative throughout all stages of litigation.
- 25 8. I believed in this case so much that I was willing to be a named plaintiff and risk personal
26 exposure and pursue this class action litigation.
- 27
28

- 1 9. Because of this lawsuit, there is a public record at the Court showing that I brought a class action
2 for unpaid wages against my former employer. The payment to me of the class representative
3 enhancement payment is not equal to the harm to my future career prospects that this case may
4 cause me.
- 5 10. I understand that my attorneys will apply to this Court for a class representative enhancement
6 payment to compensate me for my unique contributions to the success of this action in the
7 amount of \$12,000. Based on the time, risk, stress, stigma, loss of benefits, risk of an adverse
8 judgment, and outcome of this case, I believe that the requested enhancement for me is fair and
9 reasonable and request that the Court award the requested class representative enhancement
10 payment of \$12,000. I believe this amount is a fair and reasonable compensation for my efforts
11 in this case and the risks I have taken in pursuing and obtaining a fair recovery for the hundreds
12 of class members who will benefit from my institution and involvement in this litigation.
- 13 11. I am aware that my attorneys have fee-sharing agreements in this case. I understand that any
14 attorney's fees awarded will be divided among my attorneys and I have agreed to that fee
15 division.

16
17 I declare under penalty of perjury of the laws of the State of California that the foregoing is true
18 and correct.

19
20 Dated: 06/08/2026



Amelia Myers

1 **PROOF OF SERVICE**

2 I am over the age of 18 and not a party to the within action. My business address is 177 East
3 Colorado Blvd., Suite 200, Pasadena, California 91105. On June 8, 2026, I served the following
4 document(s) described as:

5 **Declaration of Amelia Myers in Support of Motion for Preliminary Approval of Class Action
6 Settlement**

7 on interested parties in this action addressed as follows:

8 *See below service list.*

9 **(By Mail)** I deposited such envelope with postage thereon fully prepaid in the United States
10 mail at a facility regularly maintained by the United States Postal Service at Los Angeles,
11 California.

12 **(By Email)** Based on a court order, Rules of Court, or an agreement of the parties to accept
13 electronic service, I caused the documents to be sent to the person(s) at the email addresses set
14 forth above.

15 **(By Overnight Delivery)** I enclosed the documents in an envelope or package provided by an
16 overnight delivery carrier and addressed to the persons at the address(es) identified above. I
17 placed the envelope or package for collection and overnight delivery at an office or a regularly
18 utilized drop box of the overnight delivery carrier.

19 xxx **(By Case Anywhere)** A true and correct copy was electronically served on counsel of record
20 by transmission to Case Anywhere.

21 I declare under penalty of perjury under the laws of the State of California that the above is true
22 and correct. Executed on June 8, 2026.

23 

24 Kale Morita
25
26
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Service List

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