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

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

22 Plaintiffs,

23 vs.

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

26 Defendants.
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Case No. 24STCV02259
CLASS ACTION

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

**Declaration of Jesse Perez in Support of
Motion for Preliminary Approval of Class,
Collective, and PAGA Action Settlement**

Date: September 28, 2026
Time: 11:00 a.m.
Dept.: 7

**Declaration of Jesse Perez in Support of Motion for Preliminary Approval of Class, Collective,
and PAGA Action Settlement**

1 I, Jesse Perez, declare:

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

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

7 5. I have and will consider the interests of the other class members just as I would my own interests
8 and understand that I need to put the interests of the other class members before my own. I have
9 participated, and will continue to participate, in this lawsuit up to and through the time of
10 judgment. I have volunteered to represent the other class members because of the importance of
11 the case and so that other class members can benefit from the enforcement of the law and the
12 savings of time, money and effort that should result if the Court treats this case as a class action.

13 6. My claims are like those of the other class members and involve the same issues. I have no
14 conflicts with members of the Settlement Class.

15 7. I have actively and diligently participated in the prosecution of this case. The activities I have
16 performed have included, but have not been limited to, obtaining legal counsel, speaking with
17 my legal counsel and members of their staff on many occasions, assisting my counsel in
18 gathering information, as well as making myself available on the day of the mediation. I have
19 also spent time reviewing the Settlement and other case related documents on my own and with
20 my counsel to make sure that the Settlement and other work my attorneys performed are in the
21 best interest of the Settlement Class. Further, I anticipate I will incur additional time even after
22 the Court grants preliminary approval of the Settlement. I believe I have been diligent in acting
23 as a class representative throughout all stages of litigation.

24 8. My attorneys have advised me of the possibility that, if the case was lost, I could have been
25 ordered to pay Defendants' costs in this case, which I understand could be significant. I believed
26 in this case so much that I was willing to be a named plaintiff and risk this personal exposure and
27 pursue this class action litigation.
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- 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 I declare under penalty of perjury of the laws of the State of California that the foregoing is true
17 and correct.
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19 Dated: 03/06/2026

20  Jun 3, 2026 12:21:36 PDT

21 Jesse Perez
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**Declaration of Jesse Perez in Support of Motion for Preliminary Approval of Class, Collective,
and PAGA Action Settlement**

See below service list.

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

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

Kale Morita

Service List

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