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Attorneys for Plaintiff, EDUARDO VENEGAS,
individually, and on behalf of Aggrieved
Employees pursuant to the California
Private Attorneys General Act

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

EDUARDO VENEGAS, individually, and on
behalf of Aggrieved Employees pursuant to
the California Private Attorneys General Act,

Plaintiffs,

vs.

IONIS PHARMACEUTICALS, INC.;
INSIGHT GLOBAL, LLC; and DOES 1
through 25, inclusive,

Defendants.

Case No. 24STCV12702
[related to Case No. 24STCV18197]

Assigned for All Purposes to:
Hon. Timothy Patrick Dillon, Dept. 15

**DECLARATION OF EDUARDO VENEGAS
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA SETTLEMENT**

Date:
Time:
Department: 15

Complaint Filed: July 23, 2024
Trial Date: Not Set

DECLARATION OF EDUARDO VENEGAS

I, Eduardo Venegas, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-entitled action. 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 Defendant Insight Global, LLC. as an hourly-paid, non-exempt employee and was staffed at Defendant Ionis Pharmaceuticals, Inc. (together, Insight Global, LLC and Ionis Pharmaceuticals, Inc. will be referred to as “Defendants”).

3. Because I thought the practices at Defendants may not be lawful, I decided to seek legal advice about my work experiences at Defendants and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendants were held accountable for not properly compensating their employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a PAGA action so that I understood what I was considering doing.

4. I have regularly communicated with my attorneys regarding the case and in order to fulfill my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with Defendants, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other hourly-paid and/or non-exempt employees, and helped determine what other documents and information they could obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my current information so that they could always reach me, and to provide any additional information that I had obtained.

5. I was always available to answer any questions my attorneys had and 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 as I could.

6. I understood that in the event this matter did not settle and proceeded with trial, I would need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any responsibilities that are necessary for this lawsuit.

7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also understood there was a risk of losing any current job and/or income due to the time that I would have to miss work in order to fulfill my duties and responsibilities in this matter, including having to attend the trial, if needed. In contrast, the other employees who will be receiving money from this lawsuit did not have to file a claim or take the risk that I took in bringing this action.

8. I reviewed the settlement agreement in this case and discussed it with my attorneys before I signed it.

9. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the Aggrieved Employees and the State of California. I have spent approximately 40-45 hours participating in this case as described above. I think my efforts helped to get the result obtained in this case.

10. I understand that any resolution of this lawsuit on a representative basis is subject to court approval. At all times throughout the course of this litigation, I have considered the interests of the Aggrieved Employees above my own personal interests.

11. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of \$10,000 for my efforts and active participation in the case. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

12. I am not related to anyone associated with Blackstone Law, APC.

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

Executed on 07/21/2026 at Escondido, California.

Eduardo Venegas

EDUARDO VENEGAS