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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA

MARICELA HERNANDEZ ROJAS,
individually, and on behalf of all others similarly
situated,

Plaintiff,

v.

AMGEN, INC., a Delaware corporation; and
DOES 1 through 10, inclusive,

Defendants.

Case No.: 2024CUOE025580

*[Assigned for All Purposes to the Hon.
Charmaine H. Buehner, Dept. J4]*

**DECLARATION OF PLAINTIFF
MARICELA HERNANDEZ ROJAS IN
SUPPORT OF PLAINTIFF’S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Final Approval Hearing:
Date: September 12, 2025
Time: 8:20 a.m.
Dept.: J4

DECLARATION OF MARICELA HERNANDEZ ROJAS

I, Maricela Hernandez Rojas, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Final Approval of Class Action and PAGA Settlement.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

2. When I decided to become involved in this lawsuit as a class representative on behalf of other employees of Amgen, Inc. (“Amgen” or “Defendant”) and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Amgen, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner’s office.

3. I was also made aware that being a class representative and private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a class representative and private attorney general, I might be responsible for some or all of Amgen’s legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

4. I understood that there were risks involved in class and representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

5. As the named plaintiff, I am the face of the litigation. The class notice that was mailed in this case to 2,971 current and former employees of Amgen, informing them that I filed a class and representative action against Amgen. Exposing myself to this kind of publicity creates a risk for my future career prospects, since current and former employees of Amgen may move to different companies within the industry or may know people at other companies within the industry who may

1 not wish to hire someone who sued her employer. I also understand that having filed this lawsuit in
2 court means that there is now a permanent public record of this lawsuit available to the general public.
3 Given this additional exposure, there is further risk to my future career prospects.

4 **Amount of Time and Effort Spent and Duration of the Litigation**

5 6. I have spent a substantial amount of time and effort on this litigation. My work on
6 this case has included, among other things, gathering and providing any employment records I had
7 to my attorneys, discussing my experiences, identifying potential witnesses, reviewing discovery and
8 data if needed, assisting my attorneys to prepare for mediation, and participating in settlement
9 discussions. After mediation, I remained actively involved by reviewing the settlement papers and
10 amended settlement papers and regularly contacting my counsel for updates. I estimate that since I
11 retained my counsel in February 2024, I have spent approximately 30 hours on the activities
12 described above.

13 **Personal Benefit Received as a Result of the Litigation**

14 7. Absent the requested service payment, the personal benefit I will receive is the same
15 as all other employees. But unlike the other employees, who are only releasing the wage and hour
16 claims asserted in the lawsuit, I have signed a general release of claims as to Amgen.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct. Executed on 8/18/2025, at Los Angeles, California.

19 DocuSigned by:

20 

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21 Maricela Hernandez Rojas