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16 Salazar and the Settlement Class

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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF SAN FRANCISCO**

14 **Estephany Gonzalez Salazar,**
15 individually and on behalf of all similarly
16 situated individuals,

17 Plaintiff,

18 vs.

19 **PNC Management, LLC**, a Delaware
20 Limited Liability Company; and **Does 1-**
21 **100**, inclusive;

22 Defendants.

CASE NO. CGC-24-618497

[Assigned to the Honorable Ethan P.
Schulman, Dept. 304]

CLASS ACTION

**SUPPLEMENTAL DECLARATION
OF ESTEPHANY GONZALEZ
SALAZAR IN SUPPORT OF
MOTION FOR:**

**(1) PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT;**

**(2) APPROVAL OF NOTICE TO
CLASS MEMBERS AND RELATED
MATERIALS; AND**

**(3) SETTING HEARING FOR FINAL
APPROVAL OF SETTLEMENT**

Date: May 1, 2026

Time: 10:00 a.m.

Dept.: 304

I, Estephany Gonzalez Salazar, declare as follows:

1. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I am the Named Plaintiff in this action. On September 26, 2024, the Class Action Complaint entitled *Estephany Gonzalez Salazar et al. v. PNC Management, LLC et al.*, Case No. CGC-24-618497 (“Action”), was filed in San Francisco County Superior Court, on my behalf and on behalf of all persons who worked at least one 3.5 hour shift as a non-exempt employee for Defendant in the State of California from the period four years prior to the filing of the Action through the date of trial (the “Class”).

3. I am a resident of the county of Contra Costa in the State of California and was an hourly, non-exempt employee of PNC Management, LLC (“Defendant”) from in or around August 26, 2023 to in or around August 24, 2024.

4. My experience working for Defendants as a Medical Assistant was substantially similar to that of my fellow Class Members, and we were all subject to the same policies, practices, and procedures complained of in this Action.

5. During my employment, I was not paid for all hours worked, including minimum and overtime wages. I was not consistently provided compliant meal and rest periods, nor was I paid premium wages when such breaks were missed. I was also required to use my personal cellphone for work purposes, including applications such as Athena Capture, without reimbursement. Additionally, as a result of these practices, I received wage statements that I understood to be inaccurate.

6. Based on my personal observations and conversations with other members of the Class, I believe we all experienced the same issues identified above with respect to our wages and rights under the Labor Code. My experience working for Defendants was, as far as I can determine, typical of and similar to each Class Members' experience relative to the issue raised in this litigation.

1 7. I hired the law firm of King & Siegel, LLP and Barahmand Law Group in order
2 to obtain justice for myself and the entire Class for these illegal labor practices.

3 8. I understand that, as a Class Representative, I have a duty to look out for and
4 protect the interests of the Class as a whole. I do not believe, nor do I have any reason to
5 believe, that my interests in this lawsuit are in conflict or in any way antagonistic to the
6 interests of those of my fellow Class Members.

7 9. Given the various defenses asserted by Defendant, the risk of losing class
8 certification or losing claims on the merits, the risk of not being awarded penalties, the delay
9 of any potential appeals, and the fact that Class Members have a need for payment sooner
10 rather than later, I believe, along with my counsel, that the Settlement obtained is fair and
11 reasonable to the members of the Class.

12 10. As the Named Plaintiff in this action, I provided valuable assistance to Class
13 Counsel and the Class in this case, including providing factual background for mediation
14 and the Class Complaint; reviewing relevant documents, the Complaint, and this
15 declaration; participating in phone calls meetings with Class Counsel to discuss litigation
16 and settlement strategy; participating in mediation preparation; informing my attorneys
17 about Defendant's settlement campaign; and reviewing the settlement documents, and
18 preparing this Declaration, among others. I agreed to participate in this case with no
19 guarantee of personal benefit.

20 11. This case also involved risks to me personally, such as the potential risk of
21 having to pay costs if we lost and the risk of negative publicity by or to anyone who opposed
22 this case. This litigation was also lengthy. I have been involved in this case—seeking to
23 obtain a benefit for the Class—for over fifteen months all with no assurance that I would
24 recover any personal benefit.

25 12. Outside of the requested incentive award and my share of the class recovery,
26 I have received no personal benefit for my work and I am not receiving any consideration
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1 for my participation in this Settlement other than my requested service award and pro rata
2 share of the Settlement.

3 13. Even in the face of these risks, I pursued this case on behalf of the Class
4 because I believe in it, and we reached a successful resolution and settlement.

5 14. I was happy to learn that the case settled on behalf of the Settlement Members
6 for the amount of \$777,630.00. I believe this is a very positive result, and glad that my
7 efforts helped other employees to benefit and obtain vindication for the Labor Code
8 violations they suffered.

9 15. I understand that class representatives are eligible for compensation for their
10 efforts as a named plaintiff in an action. I respectfully request that the Court preliminarily
11 grant an award to me in the amount of \$10,000, in addition to my pro rata share of the
12 Settlement fund.

13 16. Based on the strong result obtained for the Class, I, along with my counsel,
14 believe this is a fair and appropriate award. I am prepared, and will provide, a detailed
15 accounting of my hours spent assisting in the litigation as part of the Motion for Final
16 Approval.

17 17. I respectfully ask that the Court grant final approval of this Settlement and
18 grant my request for a service award.

19 18. I am not currently, nor have I ever been, a Named Plaintiff in any other PAGA
20 Representative case, pending or closed.

21 19. On September 25, 2024, I filed a complaint in the San Francisco County
22 Superior Court, entitled *Estephany Gonzalez Salazar v. PNC Management, LLC*, Case No.
23 CGC-24-618430 alleging individual claims for: (1) Disability Discrimination in Violation of
24 FEHA; (2) Failure to Accommodate; (3) Disability Retaliation in Violation of FEHA; (4)
25 Failure to Prevent Harassment, Discrimination, and/or Retaliation; (5) Wrongful
26 Termination in Violation of Public Policy; and (6) Failure to Engage in the Interactive
27 Process. That case was settled on May 20, 2025 and dismissed on June 9, 2025 with
28

1 prejudice. That settlement was reached eight months (8) prior to the settlement in this case
2 and was not contingent on or related to the settlement of this case.

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

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7 Executed on 05/01/26 in the county of Contra costa, California.

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10 By: 
11 Estephany Gonzalez Salazar

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Supp Gonzalez Decl ISO MPA (Gonzalez v. PNC) v2

Final Audit Report

2026-05-01

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