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5 Attorneys for Plaintiff
6 SILVIA VALDIVIA DE CABRERA

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

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11 SILVIA VALDIVIA DE CABRERA, an
individual, on behalf of herself and all
12 others similarly situated,

13 Plaintiffs,

14 vs.

15 SWIFT BEEF COMPANY, a Delaware
corporation; JBS USA, LLC, an unknown
limited liability company; JBS USA
16 HOLDINGS, INC., an unknown
corporation; JBS USA, an unknown
17 entity; JBS USA INC., an unknown
corporation; SWIFT & COMPANY INC.,
18 an unknown corporation; PILGRIM'S
PRIDE CORPORATION, an unknown
19 corporation; JBS USA FOOD
COMPANY, an unknown entity; JBS
20 USA FOOD COMPANY HOLDINGS,
an unknown entity; and DOES 1 through
21 100, inclusive

22 Defendants.
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Case No. 5:18-cv-02551-PSG-E

CLASS ACTION

**DECLARATION OF PLAINTIFF
SILVIA VALDIVIA DE CABRERA IN
SUPPORT OF MOTION FOR CLASS
REPRESENTATIVES' INCENTIVE
AWARD**

Date: November 16, 2020
Time: 1:30 p.m.
Courtroom: 6A
Judge: Hon. Philip S. Gutierrez

DECLARATION OF SILVIA VALDIVIA DE CABRERA

I, Silvia Valdivia De Cabrera, declare:

1. I am a named plaintiff in this case. As such, I have personal knowledge of, or am informed and believe, the following facts herein stated. If called as a witness, I could and would testify competently to such facts.

2. I have devoted a substantial amount of my time, both before this lawsuit was filed and during its litigation to ensure a fair result for the class.

3. My participation began with bringing certain issues that are involved in this matter to my lawyers' attention and explaining the factual background that was used to prosecute the claims in this case.

4. For example, I provided relevant documents to my lawyers, including payroll records, timesheets, the employee handbook and other policies and procedures, and I discussed documents and related facts with my lawyers to assist them in prosecuting this case.

5. I provided my lawyers with information about working conditions, work shifts, compensation, meal and rest breaks, and overtime pay to assist my lawyers in prosecuting this case. I also discussed the status of the case with my lawyers.

6. My efforts continued after suit was filed. For example, I continued to identify current and former employees and other witnesses to my lawyers, along with other information as to how they could be of potential use in this matter.

7. I spent numerous hours speaking with and providing information to my lawyers both before and during this litigation.

8. In sum, I have provided over a dozen hours of my time during the course of this litigation to ensure a good outcome for the best interests of the class.

9. I have assumed some long-lasting risk in prosecuting this case as a named plaintiff. Because it is easy to search for information online these days, I believe I will face an increased risk that future employers will discover information about this lawsuit

1 online and have a negative reaction to learning that I sued an employer. This may make
2 it harder for me to obtain future employment or change jobs.

3 I declare under penalty of perjury, under the laws of the United States of America,
4 that the foregoing is true and correct.

5 Executed this 14th day of July at ~~Moreno Valley~~, California.

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7 Silvia Valdivia De Cabrera
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9 Silvia Valdivia De Cabrera
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