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10
11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 RUBY DANIELSSON, individually, and on
14 behalf of other members of the general public
15 similarly situated and on behalf of other
16 aggrieved employees pursuant to the
17 California Private Attorneys General Act;

18 Plaintiff,

19 vs.

20 BLOOD CENTERS OF THE PACIFIC, a
21 California corporation; BLOOD SYSTEMS,
22 an unknown business entity; VITALANT, and
23 unknown business entity; and DOES 2
24 through 100, inclusive,

25 Defendants.

Case No.: 3:19-cv-04592-JCS

Honorable Joseph C. Spero

CLASS ACTION

**DECLARATION OF JOANNA GHOSH IN
SUPPORT OF PLAINTIFF’S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement and Class
Representative Enhancement Payment;
Declaration of Class Representative (Ruby
Danielsson); Declaration of Settlement
Administrator (Jarrod Salinas); and [Proposed]
Final Approval Order and Judgment filed
concurrently herewith]

Date: August 19, 2022
Time: 9:30 a.m.
Courtroom: F

Complaint Filed: March 29, 2019
FAC Filed: June 4, 2021
Trial Date: None Set

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DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers for Justice, PC, attorneys of record for Plaintiff Ruby Danielsson (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 17, 2021, Plaintiff filed the Motion for Preliminary Approval of Class Action Settlement (“Motion for Preliminary Approval”) and supporting documents (Docket Nos. 66, 66-1, 66-2, 66-3, & 66-4). On January 21, 2021, a hearing was held on Plaintiff’s Motion for Preliminary Approval, during which the Court raised multiple points of inquiry with regards to the Motion for Preliminary Approval and ordered supplemental briefing to be filed in support of Plaintiff’s Motion for Preliminary Approval by February 25, 2022. On February 25, 2022, Plaintiff filed supplemental papers in support of Plaintiff’s Motion for Preliminary Approval. (Docket Nos. 72, 72-1, & 72-2). On April 8, 2022, the Court entered an Order Granting Preliminary Approval of Class Action Settlement (“Preliminary Approval Order”) (Docket No. 73), thereby preliminarily approving the First Amended Stipulation of Settlement of Class Action and Release of Claims (“Settlement Agreement,” “Settlement,” or “Agreement”), and conditionally certifying the Class for settlement purposes. The Court also preliminarily appointed and designated Edwin Aiwasian, Arby Aiwasian, and Joanna Ghosh of Lawyers for Justice, PC as Class Counsel, Plaintiff Ruby Danielsson as Class Representative, and Phoenix Settlement Administrators to serve as the Settlement Administrator for handling the notice and settlement administration process.

MOTION FOR ATTORNEYS’ FEES AND COSTS

3. On May 23, 2022, Plaintiff filed a Motion for Attorneys’ Fees and Costs and papers in support thereof. (Docket Nos. 74, 74-1, & 74-2). The Court is respectfully referred to Paragraphs 3 through 19 of the Declaration of Edwin Aiwasian in Support of Plaintiff’s Motion

1 for Attorneys' Fees and Costs (Docket No. 74-1), for a discussion of the work performed by
2 Class Counsel in this matter as well as the adequacy of Class Counsel.

3 **CLASS ACTION FAIRNESS ACT NOTICE**

4 4. Defendant's counsel has advised Plaintiff's counsel that Defendant caused the
5 Class Action Fairness Act Notice pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. §
6 1715 ("CAFA Notice") to be transmitted via Certified Mail on March 3, 2022 to the Office of the
7 Attorney General of the United States Department of Justice, the CAFA Coordinator of the
8 Office of the Attorney General of the State of California, the Office of the Attorney General of
9 the State of Arizona, and the office of the attorney general of all states where Class Members
10 reside (specifically, for the states of Colorado, Florida, Hawaii, Illinois, Massachusetts, Nevada,
11 Oregon, Tennessee, Texas, and Washington).

12 **NO OBJECTIONS TO THE SETTLEMENT**

13 5. As of the date of this declaration, Class Counsel has not received notice of any
14 written objections ("Notices of Objection") to the Settlement or the request for Attorneys' Fees
15 and Costs, Class Representative Enhancement Payment, Settlement Administration Fees and
16 Costs, or allocation for the penalties under the Private Attorneys General of 2004, California
17 Labor Code section 2698, *et seq.* ("PAGA").

18 **CLASS REPRESENTATIVE ENHANCEMENT PAYMENT TO PLAINTIFF**

19 6. In recognition of her efforts and work serving as the Class Representative, the
20 Settlement provides for a Class Representative Enhancement Payment in the amount of
21 \$8,500.00 to Plaintiff. The requested Class Representative Enhancement Payment is fair and
22 appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant
23 documents and past employment records and provided the facts and evidence necessary to
24 attempt to prove the allegations. Plaintiff was available whenever Class Counsel needed her and
25 actively tried to obtain and provide information that would facilitate the pursuit of the claims in
26 this matter. Plaintiff spent numerous hours speaking with Class Counsel about her claims,
27 describing her work experiences with Defendant, and gathering and reviewing documents.
28 Accordingly, it is appropriate and just for Plaintiff to receive \$8,500.00 as a reasonable Class

1 Representative Enhancement Payment, in addition to her Individual Settlement Payment and
2 Individual PAGA Payment, for her services in this matter.

3 7. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
4 Settlement is in the best interests of Plaintiff, the Class, and the State of California.

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

7 Executed this 25th day of July 2022, at Glendale, California.

8 /s/ Joanna Ghosh

9 _____
10 Joanna Ghosh

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