

1 Edwin Aiwazian (Cal. State Bar No. 232943)
edwin@calljustice.com
2 Arby Aiwazian (Cal. State Bar No. 269827)
arby@calljustice.com
3 Joanna Ghosh (Cal. State Bar No. 272479)
joanna@calljustice.com
4 **LAWYERS for JUSTICE, PC**
410 West Arden Avenue, Suite 203
5 Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

6 *Attorneys for Plaintiff*

7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 RUBY DANIELSSON, individually, and
on behalf of other members of the general
11 public similarly situated and on behalf of
other aggrieved employees pursuant to the
12 California Private Attorneys General Act;

13 Plaintiff,

14 vs.

15 BLOOD CENTERS OF THE PACIFIC, a
California corporation; BLOOD SYSTEMS,
16 an unknown business entity; VITALANT, an
unknown business entity; and DOES 2
17 through 100, inclusive,

18 Defendants.

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

Honorable Joseph C. Spero

DECLARATION OF RUBY DANIELSSON 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; Declaration of Class Counsel (Joanna Ghosh); 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.
Department: F

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

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

DECLARATION OF RUBY DANIELSSON

I, Ruby Danielsson, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. 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 Vitalant f/k/a Blood Systems, Inc. formerly d/b/a Blood Centers of the Pacific (“Vitalant”) as an hourly-paid, non-exempt employee from approximately December 2005 to approximately April 2017. I decided to seek legal advice about my work experiences with Vitalant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwazian. I wanted to do whatever I could to make sure that Vitalant was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 11 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 10 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and eventually PAGA representative.

3. I have spent over 16 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Vitalant, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Vitalant. I routinely checked in with my attorneys and their staff to make sure they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and available 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 and identified as many

1 documents as I could. I spent at least 12 additional hours speaking with my attorneys about the
2 case, identifying potential witnesses, providing my attorneys with documents and information
3 concerning the case, and also describing policies, practices, and procedures of Vitalant.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about 4 hours reviewing the settlement
6 documents and about 3 hours asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts have helped to obtain the result in this case, and as
11 a class and PAGA representative, I respectfully request that the Court award me an enhancement
12 payment in the amount of \$8,500.00 for my active participation in this case. Taking into
13 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

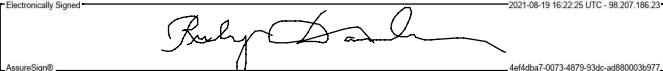
14 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as an enhancement payment, as well as my share of the settlement as a class
18 member and as an aggrieved employee.

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

08/19/2021

21 Executed this ____ day of August 2021, at San Francisco, California.

22  2021-08-19 16:22:25 UTC - 98.207.186.23
AssureSign® 4ef4dba7-0073-4879-93bc-ad8800036977

23 Ruby Danielsson

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203