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Attorneys for Plaintiff CARLOS MORENO

16 **UNITED STATES DISTRICT COURT**  
 17 **CENTRAL DISTRICT OF CALIFORNIA**

CARLOS MORENO, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

PRETIUM PACKAGING, L.L.C, a Delaware limited liability company, and DOES 1 through 10, inclusive

Defendants

Case No. 8:19-cv-02500-SB-DFM

[Hon. Stanley Blumenfeld, Jr.]

**SALVADORA DOMINGUEZ'S  
 DECLARATION IN SUPPORT OF  
 PLAINTIFF'S MOTION FOR  
 FINAL APPROVAL OF CLASS  
 ACTION SETTLEMENT AND  
 CLASS REPRESENTATIVE  
 SERVICE PAYMENT AND  
 MOTION FOR ATTORNEY'S  
 FEES AND COSTS**

Date: August 6, 2021  
 Time: 8:30 a.m.  
 Courtroom: 6C

1 **DECLARATION OF SALVADORA DOMINGUEZ**

2 I, Salvadora Dominguez, declare as follows:

3 1. I am an adult resident of the State of California, and, if called as a  
4 witness in this action, I would testify truthfully to the matters described in this  
5 declaration. All of the matters described in this declaration are within my personal  
6 knowledge.

7 2. I make this declaration entirely of my own free will and choice. I have  
8 not been promised any benefit for doing so, and I have not been pressured into  
9 giving this declaration. Before signing this declaration, I was given the opportunity  
10 to review it, make changes, and verify the accuracy of its contents. I also  
11 understand that this declaration may be used in support of Plaintiff’s Motion for  
12 Final Approval of Class Action Settlement and Class Representative Service  
13 Payment and Plaintiff’s Motion for Attorney’s Fees and Costs.

14 3. I am a former employee of Defendant Pretium Packaging, L.L.C.  
15 (“Pretium”) and Class Member in this action. I worked for Pretium from  
16 approximately February 2013 to approximately February 2017 as a Packer. I also  
17 worked with Plaintiff Carlos Moreno.

18 4. During my employment with Pretium, Pretium did not provide me with  
19 all legally required meal and rest breaks and I was not properly compensated for  
20 missed meal or rest breaks. Sometimes, I was not properly paid overtime when I  
21 worked more than eight hours per day or more than 40 hours per work week, and,  
22 sometimes, I was not properly paid double overtime when I worked more than 12  
23 hours per day.

24 5. I fully support the class action settlement. The estimated amount I will  
25 receive from this settlement is \$2,259.46. I believe the settlement is a good  
26 settlement and I would recommend that the Court approve it because I believe that  
27 this settlement is fair, adequate, and reasonable.

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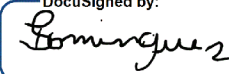
1           6. I understand that the settlement agreement provides a service payment  
2 to Plaintiff Carlos Moreno in the amount of \$10,000. I believe this payment is fair  
3 compensation for his time and effort on this case, and for the risk that he took in  
4 helping me and my former co-workers. Without the efforts of Mr. Moreno, I do not  
5 believe that I would have received compensation for my Labor Code claims against  
6 Pretium.

7           7. I understand that Plaintiff's Counsel seek attorney's fees in the amount  
8 of one-third of the \$1.6 million settlement (i.e., \$533,333.33). Although I did not  
9 receive the initial mail about the class action settlement, the Plaintiff's Counsel's  
10 office actively reached out to me by phone to inform me about the settlement.  
11 Plaintiff's Counsel also made sure to get my updated address so that I could receive  
12 the Class Notice and ultimately receive the settlement payment. Plaintiff's Counsel  
13 also answered my questions regarding the settlement and payment, including the  
14 amount I would receive from the settlement. Plaintiff's Counsel have been  
15 thorough, diligent, prompt, courteous, and professional, and I believe that they are  
16 fully entitled to the award of fees that they have requested for their hard work. I do  
17 not believe that I would not have received the compensation for my Labor Code  
18 claims against Pretium without Plaintiff's Counsel's hard work and diligent efforts.

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

21           Executed on 7/3/2021, in 7810 Maple Ave. Fontana, CA 92336.

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DocuSigned by:  
  
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Salvadora Dominguez