

1 **ZIMMERMAN REED LLP**
Caleb Marker (SBN 269721)
2 caleb.marker@zimmreed.com
Flinn T. Milligan (SBN 323042)
3 flinn.milligan@zimmreed.com
6420 Wilshire Blvd., Suite 1080
4 Los Angeles, CA 90048
Tel: (877) 500-8780
5 Fax: (877) 500-8781

6 **LOCKRIDGE GRINDAL NAUEN PLLP**
Susan E. Ellingstad (*Pro hac vice*)
7 Email: seellingstad@locklaw.com
Kristen G. Marttila (*Pro hac vice*)
8 Email: kgmarttila@locklaw.com
Kailey C. Mrosak (*Pro hac vice*)
9 Email: kcmrosak@locklaw.com
100 Washington Ave. S., Suite 2200
10 Minneapolis, MN 55401
Tel: (612) 339-6900
11 Fax: (612) 339-0981

12 *Attorneys for Plaintiffs and the Class*

13
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF SANTA CLARA**

16 R. ROSS and C. ROGUS, individually and on
17 behalf of all others similarly situated,

18 Plaintiffs,

19 v.

20 HEWLETT PACKARD ENTERPRISE
21 COMPANY, a Delaware corporation, (formerly
22 HEWLETT-PACKARD COMPANY),

23 Defendant.

CASE NO.: 18CV337830

*Assigned for All Purposes to the
Honorable Sunil R. Kulkarni*

**DECLARATION OF PLAINTIFF CLAUDIA
ROGUS IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES, AND PAYMENT OF SERVICE
AWARDS**

Date: April 27, 2023
Time: 1:30 PM
Dept: 1

Date Action Filed: November 8, 2018
Trial Date: TBD

(REPRESENTATIVE/CLASS ACTION)

1 I, Claudia Rogus, declare and state as follows:

2 1. I am a Plaintiff and Class Representative in this action. I have personal knowledge of the
3 statements contained in this declaration and if called as a witness, I could and would testify competently
4 to those facts and opinions.

5 2. I was employed by Hewlett Packard Enterprise Company (“HPE”) from 2013 to 2018.
6 To this end, I was an employee of the Hewlett-Packard Company prior to the formation of HPE in 2015.

7 3. I have served as a Named Plaintiff in this action since the Complaint was filed on
8 November 8, 2018. I worked with Class Counsel before the Complaint was filed to assist in investigating
9 and preparing the action.

10 4. I was not promised any amount of money to serve as a Class Representative or in my
11 approval of this Settlement. My approval is based on my understanding of the record and the risks of
12 continuing litigation and my belief that the Settlement is in the best interests of the Class.

13 5. As Class Representative, I expended substantial time and effort to benefit the class. I
14 spent this time and effort with no guarantee it would result in any recovery for me.

15 **My Efforts as Class Representative**

16 6. Before the filing of this action in November 2018, I assisted Class Counsel in
17 investigating the claims and drafting the Complaint.

18 7. In November 2018, I reviewed the operative complaint and authorize Class Counsel to
19 finalize it.

20 8. In 2019, I consulted with Class Counsel about HPE’s demurrer and motion to strike.

21 9. Throughout discovery efforts, I participated in conference calls with Class Counsel to aid
22 their understanding of documents obtained through discovery.

23 10. Also during discovery, I searched for all relevant documents in my possession and
24 delivered them to Class Counsel, and worked with Class Counsel to provide thorough and accurate
25 responses to multiple sets of special interrogatories and requests for production.

26 11. In January and February of 2022, I reviewed drafts of Plaintiffs’ mediation statements
27 and discussed recovery with Class Counsel.

28 12. After the February 14, 2022 mediation session, I actively participated in conversations

1 with Class Counsel about settlement terms, reviewed the terms of the proposed settlement agreement,
2 and provided critique.

3 **Risks Involved in Serving as Class Representative**

4 13. Given the prominence and power of HPE and the nature of this action, I have taken
5 substantial risks in my own career by serving as Class Representative. Although it may have been much
6 safer for my professional goals to not file a public class action, I accepted the risk of future professional
7 setbacks because I wanted to help other women who experienced discrimination at HPE. The risks of
8 serving as Class Representative in this action will continue throughout my career.

9

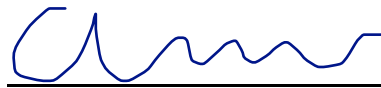
10 I declare under penalty of perjury that the foregoing is true and correct to the best of my
11 knowledge.

12

Executed this March 14, 2023 at Los Angeles, California.

13

14



Claudia Rogus

15

16

17

18

19

20

21

22

23

24

25

26

27

28