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Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE**

CINDY VELASQUEZ, individually, and on behalf of other members of the general public similarly situated; PAULINA CAMPOS, individually, and on behalf of other members of the general public similarly situated, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiffs,

v.

AMADA ENTERPRISES, INC., a California corporation; VIEW HEIGHTS COVALESCENT HOSPITAL, INC., an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 20STCV07994 (Lead Case)
20CMCV00227

Honorable Stuart M. Rice
Department SSC-1

CLASS ACTION

**DECLARATION OF PAULINA CAMPOS
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT AWARDS**

[Notice of Motion and Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Awards; Declaration of Class Representative (Cindy Velasquez); Declaration of Class Counsel (Joanna Ghosh and Heather Davis); and [Proposed] Final Approval Order filed concurrently herewith]

Date: February 15, 2024
Time: 10:30 a.m.
Department: SSC-1

Complaint Filed: February 28, 2020
FAC Filed: February 2, 2021
Trial Date: None Set

DECLARATION OF PAULINA CAMPOS

I, **Paulina Campos**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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 Amada Enterprises, Inc. and View Heights Convalescent Hospital, Inc. (together, "Defendants") as an hourly-paid, non-exempt Case Manager from approximately July 2009 to approximately July 2012, an hourly-paid, non-exempt Discharge Coordinator from approximately July 2012 to approximately 2014, and an hourly-paid, non-exempt Social Service Director from approximately 2014 to approximately June 2019. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were 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 6 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 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 a PAGA representative.

3. I have spent over 14 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, and providing guidance regarding the duties of hourly-paid and/or non-exempt employees, and helping develop a strategy as to what documents and information to obtain

1 from Defendants. I routinely checked in with my attorneys and their staff to make sure that they
2 had all my most current information and any additional information that I had obtained.

3 4. As the case progressed, I was available to answer any questions my attorneys had,
4 and available to speak and meet with my attorneys whenever they needed me. I responded to them
5 as quickly as possible and gave them as much information and identified as many documents as I
6 could. I spent at least 13 additional hours speaking with my attorneys about the case, identifying
7 potential witnesses, providing my attorneys with documents and information concerning the case,
8 and also describing policies, practices, and procedures of Defendants.
9

10 5. As far as the settlement is concerned, I was available to review documents and
11 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement agreement
12 and about 4 hours asking questions and discussing the settlement with my attorneys before signing
13 the agreement.
14

15 6. I believe that I have done everything that my attorneys have asked of me and have
16 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
17 and the State of California. I think my efforts helped to get the result obtained in this case, and as
18 a class and PAGA representative, I respectfully request that the Court award me an enhancement
19 award in the amount of \$7,500.00 for my active participation in this case. Taking into
20 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.
21

22 7. I am not related to anyone associated with Lawyers *for* Justice, PC or Protection
23 Law Group, LLP.

24 8. I have not entered into any undisclosed agreements, nor have I received any
25 undisclosed compensation in this case. The only compensation I will receive is whatever amount
26 the Court awards as an enhancement award, as well as my share of the settlement as a class
27 member and as an aggrieved employee.
28

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

06/20/2023

3 Executed this _____ day of June 2023, at South Gate, California.

4 
5 Electronically Signed 2023-06-20T18:25:52-0700-6324932.115
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6 Paulina Campos

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