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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 CINDY VELASQUEZ 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 (Paulina Campos); 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 CINDY VELASQUEZ

I, **Cindy Velasquez**, 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 Receptionist, Behavior Monitor, and Case Manager from approximately August 2010 to approximately February 2017. 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 paid me and other employees what was owed to us for all hours worked and non-compliant meal and rest breaks, and held accountable. 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 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 5 hours discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over 14 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a plaintiff and class 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 from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and any additional information that I had obtained.

1 4. Throughout the case, I was available to answer any questions my attorneys had, and
2 available to speak and meet with my attorneys whenever they needed me. I responded to them as
3 quickly as possible and gave them as much information and identified as many documents as I
4 could. I spent at least 12 additional hours speaking with my attorneys about the case, identifying
5 potential witnesses, providing my attorneys with documents and information concerning the case,
6 and also describing policies, practices, and procedures of Defendants.

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

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

18
19 7. I am not related to anyone associated with Lawyers *for* Justice, PC or Protection
20 Law Group, LLP.

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

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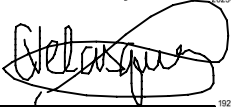
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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

06/20/2023

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

4 Electronically Signed

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