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Attorneys for Plaintiff Julio Ochoa, individually and
on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

JULIO OCHOA, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SPEECH AND LANGUAGE
DEVELOPMENT CENTER, INC.; and
DOES 1 through 25, inclusive

Defendants.

Case No. 30-2020-01143577-CU-OE-CXC
ASSIGNED FOR ALL PURPOSES TO:

The Honorable Lon F. Hurwitz

Department CX103

CLASS ACTION

**DECLARATION OF JULIO OCHOA IN
SUPPORT OF MOTION FOR ORDER
GRANTING FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Set by Court Order - ROA #194

Date: May 17, 2024

Time: 1:30 p.m.

Dept: CX 103

Judge: Hon. Lon F. Hurwitz

Complaint filed: June 18, 2020

Trial date: Not set

1 I, Julio Ochoa, declare as follows:

2 1. I am the Class Representative in this lawsuit. I have personal knowledge of facts
3 in this declaration, and could competently testify to them if called as a witness.

4 2. I worked for Speech and Language Development Center ("SLDC") as a Special
5 Education Paraprofessional, sometimes referred to as Aide or Bus Aide, from August 2012
6 through March 2020.

7 3. I am not related to any attorney working on the case, I am not aware of any
8 interests I have averse to any class member's interest, and I have no conflicts that would or
9 have kept me from adequately representing the class. Throughout this case, I have been and
10 remain committed to prosecuting this case vigorously on behalf of the class.

11 4. This case has been going on for almost 4 years. It is hard to determine exactly
12 how much time I spent on this case over the past 46 months. For example, I spent a lot of time
13 just reviewing the pros and cons of filing a class action, with my attorneys and on my own, and
14 considering whether I could bear the risks of this lawsuit. I estimate I spent an average of 1-2
15 hours or each month, or around 45-50 total hours. Some weeks required more time than others,
16 particularly during the time before filing the lawsuit, and the time leading up to mediation. I
17 can say that all the time I spent on the case was time I could not spend with family or friends or
18 on other personal activities.

19 5. I understand I am eligible for an additional payment for serving as a class
20 representative, and that this payment is subject to Court approval. Considering the time I spent,
21 the risks I took, the work I did, not for myself, but on behalf of other employees, the money
22 those employees will receive from the settlement, and the additional length of time to obtain a
23 class, rather than individual settlement, I believe the requested award of \$5,000 is reasonable

24 6. My attorneys explained the duties of a class representative to me. When I
25 decided to become a class representative, I understood I was not only seeking compensation for
26 myself, but also for others who worked for SLDC. I agreed to do this for the other employees
27 who may not have been aware of their rights or may have been concerned about retaliation for
28 bringing a claim against a current employer.

8. I understood by filing a class action against an employer I risked losing future employment opportunities because an internet search would show I sued a past employer for employment claims on behalf of a class of employees. This case comes up as the first two results on Google for a search of my name and “Speech Language.”

9. My attorneys discussed mediation with me to obtain additional information to help prepare a brief and use in negotiations. I made myself available by phone on April 20, 2021, the day of mediation, for any questions by my attorneys or the mediator.

10. I spoke to my attorneys on the day of mediation, discussed the proposed terms, and reviewed and signed a Memorandum of Understanding.

11. After a long form settlement was negotiated, I reviewed it and discussed it with my attorneys and signed. I also reviewed and signed an amendment to the agreement.

12. Throughout my participation in the case, I have kept in constant contact with my attorneys to obtain updates and status reports on the case and settlement.

13. I took my duties and responsibilities as a class representative seriously and have done all the work asked of me by my attorneys.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on 4/23/2024 in Bell gardens, California.

Inlco

Julio Ochoa