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13 on behalf of all others similarly situated

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

15 **FOR THE COUNTY OF ORANGE**

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

18 Plaintiff,

19 v.

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

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

The Honorable Lon F. Hurwitz

Department CX103

CLASS ACTION

**DECLARATION OF EVELIN REYES
FOR SIMPLURIS, INC. [PROPOSED
SETTLEMENT ADMINISTRATOR]**

Date: March 17, 2023

Time: 1:30 p.m.

Dept: CX103

Judge: Lon F. Hurwitz

Complaint filed: June 18, 2020

Trial date: Not set

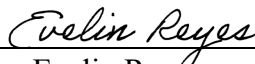
1 I, Eveline Reyes, declare as follows:

2 1. I am employed as a Case Manager by Simpluris, Inc. ("Simpluris"), the
3 proposed settlement administrator in the above-entitled action. My business address is 3194-C
4 Airport Loop Drive, Costa Mesa, CA 92626. I am over 21 years of age and authorized to make
5 this declaration on behalf of Simpluris and myself.

6 2. On December 28, 2022, Counsel for Defendant provided Simpluris with the data
7 necessary to make preliminary estimated calculations regarding Class member and Named
8 Plaintiff settlement payments. Based on the data provided, 268 Class Members worked a total of
9 18516 workweeks during the Class Period, and 155 PAGA Members worked a total of 1971 pay
10 periods during the PAGA Period. The class period is from April 6, 2016 to March 13, 2020 and
11 April 6, 2019 to March 13, 2020.

12 3. Barring any class member opt-outs and court deductions to the awards of
13 requested attorneys' fees and costs, class representative service payment, and settlement
14 administrations costs, Participating Class Members may expect to receive an estimated average
15 payment of \$1,684.70, with the lowest estimated payment of \$24.38 and highest estimated
16 payment of \$3,365.04. The estimated payment to the Named Plaintiff, Julio Ochoa, is \$
17 \$3,365.04.

18
19 I declare under the penalty of perjury under the laws of the State of California the
20 foregoing is true and correct and this declaration is executed March 1, 2023, in Costa Mesa,
21 California.

22 
23 Evelin Reyes