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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

JEANETTE JUSTON, as an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

SOSI SERVICES LLC, a Delaware Limited
Liability Company; and DOES 1 through 100,

Defendants.

Case Nos. 20STCV16867

*[Assigned for all purposes to the Hon.
Rupert A. Byrdsong, Dept. 28]*

**DECLARATION OF JEANNETTE
JUSTON IN SUPPORT OF APPROVAL
OF CLAIMS BROUGHT UNDER THE
PRIVATE ATTORNEYS GENERAL
ACT, AND REASONABLE ATTORNEYS'
FEES AND COSTS**

Action Filed: April 30, 2020
Trial Date: None Set

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I, JEANNETTE JUSTON, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter against Defendants SOSi Services LLC and SOS International LLC (collectively, “SOSi”). This declaration is submitted in support of approval of the Settlement Agreement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for SOSi as an “Interpreter” from approximately May 1, 2019 to September 8, 2020.

3. While working for SOSi, I was classified as an independent contractor. Although, I was paid on an hourly wage, my total hourly wages were predetermined and not based on the actual number of hours I worked in a given day. For instance, I was paid for a minimum of three hours per appearance. If the appearance lasted longer than three hours, then I was paid an additional hourly wage for each hour over three-hours. I was not separately paid for my rest periods or other “nonproductive” time and thus, I believe I was not paid at least the minimum wage for all hours worked. I was also not provided with a 10-minute rest break during my shifts. I also did not receive reimbursement for the equipment I had to purchase, including sound enhancing equipment, pens, and paper. I was also not reimbursed for all my mileage or parking when I was required to travel for appearances that were further away.

4. When I filed this lawsuit, I understood that this lawsuit could benefit my former co-workers, other interpreters who worked for SOSi, and the State of California by helping to recover penalties on their behalf. I knew there were risks associated with filing a lawsuit, but I accepted the risks because I wanted SOSi to comply with the law. Even though I understood that this lawsuit would be a public record, I accepted that burden for the benefit of my co-workers and other interpreters who worked for SOSi.

5. I have been actively involved in this case since it was first filed in April 2020. Among other things, I searched for and gathered documents and provided them to my attorneys, and engaged in multiple discussions with my attorneys regarding SOSi's policies and practices,

1 my work for SOSi, my work hours and inability to take rest breaks. I also spoke to my attorneys
2 about other interpreters of SOSi who experienced similar wage and hour violations and who I
3 believed could act as witnesses as well as general case strategy to help facilitate a beneficial
4 settlement.

5 I declare under penalty of perjury under the laws of the state of California and the United
6 States that the foregoing is true and correct. Executed on February 12, 2021 at San Bernardino,
7 California.

8 *Jeannette Juston*
9 Jeannette Juston (Feb 12, 2021 17:49 PST)

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