

James R. Hawkins (SBN 192925)
Christina M. Lucio (SBN 253677)
JAMES HAWKINS APLC
9880 Research Drive, Suite 200
Irvine, California 92618
Telephone: (949) 387-7200
Facsimile: (949) 387-6676

Attorneys for Plaintiff TANIYA ABRON
on behalf of herself and all others similarly situated

SUPERIOR COURT OF CALIFORNIA

COUNTY OF ALAMEDA

TANIYA ABRON, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

UNIVERSITY HEALTHCARE ALLIANCE,
a California Corporation; and DOES 1-10,
inclusive,

Defendants.

Case No. RG20066438

Assigned for all purposes to
Hon. Evelio Grillo
Dept. 21

**DECLARATION OF TANIYA ABRON
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 23, 2023
Time: 9:00a.m.

Action Filed: June 30, 2020
SAC Filed: September 28, 2022
Trial Date: None Set

RES ID: 269846710090

DECLARATION OF TANIYA ABRON

I, Taniya Abron, declare as follows:

1. I am an individual over 18 years of age and a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Defendant University Healthcare Alliance (the "Company" or "UHA") from approximately 2015 to April, 2020 as a non-exempt employee. I worked for the Company at their Newark location as an imaging specialist.

3. I contend that during my employment, I was not paid for all hours worked, and I was not provided compliant meal and rest periods. My employer also failed to keep accurate records during my employment, failed to compensate me for meal and rest periods that weren't lawfully provided, and didn't provide me with accurate wage statements. I also was not paid all wages I was owed at the time of my termination.

4. I am informed and believe that I was subject to the same policies and procedures, including without limitation timekeeping, rounding, meal period, and rest period policies, as the other non-exempt employees working for the Company during the relevant time period.

5. After meeting with my attorneys about these issues, I decided to proceed with a lawsuit against my former employer, UHA. At the time, I also agreed to represent all other similarly situated employees who worked for UHA in California. I agreed to obtain relief for the entire class. I also agreed to consider the interest of the class just as I would consider my own interest.

6. I filed a Class action Complaint ("Complaint") with the Superior Court of California for the County of Alameda, entitled *Abron v. University Healthcare Alliance*, et al. Case No. RG20066438 ("Class Action"). The complaint included claims for failure to pay wages for all hours worked, failure to timely pay wages due at termination, failure to provide accurate wage statements and violation of the unfair competition law. I understand that the complaint was later amended to add a claim for penalties on behalf of the State of California for the Company's violations of the Labor Code and to assert claims for failure to provide meal periods and rest periods, based upon information that I provided my attorneys regarding my employment.

1 7. When I agreed to represent the class, I understood it was my duty to be readily
2 available and to participate actively in the case. I knew that I needed to keep aware of the
3 status and progress of the lawsuit. At all times, I worked to fulfill these duties on behalf of the
4 Class.

5 8. I also understood the risks I could face due to my involvement as a named
6 plaintiff. I understand that I could be held responsible for the payment of Defendants' court-
7 awarded litigation costs and potentially attorneys' fees if I did not prevail in the litigation.
8 Therefore, I realized that I was taking a significant amount of risk in filing the class action
9 lawsuit.

10 9. I knew that my name could easily be located on a search of court records and that
11 any prospective employer may find out that I had sued my former employer.

12 10. Even though I knew I was taking risks, I knew I had to do what I believed was
13 right and pursue claims on behalf of other employees to vindicate our rights and attempt to
14 recover the wages owed to us.

15 11. I spent a substantial amount of time and effort pursuing my claims and the claims
16 of the other similarly situated employees from the time I retained my attorneys to this date.
17 Throughout the pendency of this lawsuit, I have assisted my attorneys. This included meeting
18 and conferring with my attorneys on numerous occasions, locating relevant documents and
19 information, identifying witnesses, providing my attorneys with documents and information,
20 reviewing documents in this case, assisting with mediation, and eventually, assisting with the
21 Settlement Agreement and the approval process.

22 12. I understand that the class claims alleged in this action were brought on behalf of
23 other similarly situated employees, and thus I am acting as a representative for the Class. As
24 the class representative, I understand that it is my responsibility to act in the Class's best
25 interest. I am not aware of any conflicts that exist between my interest and the interests of the
26 Class that would impair or affect my ability to serve as representative for the Class.

27 13. I have and continue to be willing to assist in the investigation and litigation of
28 this matter, as well as make myself available for trial or any further proceeding in this matter
as required to represent the interests of the Class. I also understand my duties and
responsibilities to the Class and will carry out those duties as necessary.

1 14. Throughout this case, I have continuously been kept apprised of the status of this
2 case.

3 15. I have always considered the interests of the Class just as I would consider my
4 own interest and placed the interests of the class above my own since I started the case.

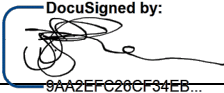
5 16. I understand that over 1700 current and former employees of Defendant will be
6 eligible to participate in the settlement and receive a settlement payment from the \$5,000,000
7 that secured in connection with this action.

8 17. Based on my understanding of the case, I believe that the settlement for the
9 consideration and on the terms set forth in the Settlement Agreement are fair, reasonable, and
10 adequate and is in the best interests of the Class. I am proud of the accomplishment that this
11 lawsuit achieved on behalf of the others.

12 18. I am committed to this case and intend to continue to participate as needed in the
13 settlement process.

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

16 Executed on this 22 day of May/2023, at Hayward, California.

17
18 
19 9AA2EFC20CF34EB...
20 Taniya Abron



Superior Court of Alameda County Public Portal

Make a Reservation

Abron VS University Healthcare Alliance, a California corpor

Case Number: RG20066438 Case Type: Unlimited Civil Category: Other Employment Complaint Case
Date Filed: 2020-06-30 Location: Rene C. Davidson Courthouse - Department 21

Reservation

Case Name: Abron VS University Healthcare Alliance, a California corpor	Case Number: RG20066438
Type: Motion re: (Motion for Preliminary Approval)	Status: RESERVED
Filing Party: Taniya Abron (Plaintiff)	Location: Rene C. Davidson Courthouse - Department 21
Date/Time: 06/23/2023 9:00 AM	Number of Motions: 1
Reservation ID: 269846710090	Confirmation Code: CR-OQUYRNJZTFKVVRHCA

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	0.00	1	0.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount: \$1.00	Type: Visa
Account Number: XXXX6358	Authorization: 03441D
Payment Date: 1969-12-31	

[Print Receipt](#)

[+ Reserve Another Hearing](#)

[View My Reservations](#)

[Terms of Service](#)

[Contact Us](#)

[About this Site](#)

Copyright © Journal Technologies, USA. All rights reserved.