

James R. Hawkins, Esq. SBN 192925
Isandra Fernandez, Esq. SBN 220482
Lance E. Dacre, Esq. SBN 190305
JAMES HAWKINS APLC
9880 Research Drive, Suite 200
Irvine, CA 92618
TEL: (949) 387-7200
FAX: (949) 387-6676
Email:
isandra@jameshawkinsaplc.com
lance@jameshawkinsaplc.com
minh@jameshawkinsaplc.com

Attorneys for Plaintiff, JAZMIN ALEJO
on behalf of herself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

JAZMIN ALEJO on behalf of herself and all
others similarly situated,

Plaintiff,

vs.

PACKARD CHILDREN'S HEALTH
ALLIANCE, a California corporation, and
DOES 1 through 50, inclusive,

Defendants.

Case No. 20CV366750
ASSIGNED FOR ALL PURPOSES TO:
JUDGE: Hon. Beth McGowen
DEPT: 22

**DECLARATION OF JAZMIN ALEJO IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

DECLARATION OF JAZMIN ALEJO

I, Jazmin Alejo, declare as follows:

1. I am a Named Plaintiff and Class Representative in the case of *Jazmin Alejo v. Packard Children's Health Alliance* ("Defendant") (Santa Clara County Case No. 20CV366750).

I make this declaration on the basis of my personal knowledge and if asked to testify thereto I could and would do so.

2. I was employed by Defendant from on or about November 4, 2019 through on or about January 31, 2020 and worked at Defendant's facility located in Monterey, California. During my employment with Defendant, I occupied a non-exempt hourly position as a Medical Assistant.

3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances that I had against Defendant, I was made aware of the advantages and disadvantages of litigation. I was also made aware of my responsibilities as both a Plaintiff and a class and PAGA representative prior to filing the class action complaint which was filed on or about June 1, 2020. I accepted the responsibility and agreed to move forward. I pledged to participate actively in the lawsuit.

4. During the litigation of this case, I have continuously interacted with my attorneys to discuss the status of the case. I provided relevant oral and documentary information necessary to prosecute this case. By way of example, I searched for and provided relevant documents pertaining to my employment with Defendant and engaged in multiple discussions with my attorneys regarding my employment. These discussions include, but are not limited to, the following topics: the policies, practices and specific working conditions under Defendant. I have also had discussions with my attorneys regarding the progress of this case and with class members regarding the claims alleged. I have spent approximately 40 to 50 hours assisting my attorneys in their litigation of this case.

5. By agreeing to bring this action, I formally accepted the responsibilities of representing the interests of all similarly situated employees in California and willingly chose to

1 assume risks and potential costs that I alone might have to bear if judgment would have been
2 rendered in favor of Defendant.

3 6. As part of the settlement agreement, I also signed a general release releasing all
4 claims I have or may have against Defendant which is far broader than the release provided by
5 class members. The class representative service payment also serves as compensation for
6 agreeing to a full, general release of all claims against Defendant.

7 7. I also risked the potential stigma of being a named plaintiff in a representative
8 action labor dispute which could affect my further employability in the industry or with any
9 prospective employer who learns of my lawsuit against a former employer.

10 8. The class representative service payment, subject to court approval, is Ten
11 Thousand Dollars (\$10,000). I believe that this amount is fair and reasonable in light of the risks
12 undertaken (both personal and financial) in litigating this matter as a class action and PAGA
13 representative, as well as the time and effort I have expended in doing so, which have resulted in
14 a favorable outcome to the class members and aggrieved employees.

15 9. I have not directly experienced negative effects in relation to any further
16 employment opportunities because of this lawsuit. However, I did risk negative effects on my
17 employability when I formally accepted the responsibilities of a class representative and
18 willingly chose to assume significant risks and potential costs that I alone might have had to bear
19 if judgment would have been rendered in favor of Defendant.

20
21 I hereby declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

23
24 Executed on March 11, 2026 at Salinas, California

25
26 DocuSigned by:
27 
28 Jazmin Alejo