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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

CYNTHIA BARRAGAN, individually, and
on behalf of other members of the general
public similarly situated, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

TIBURCIO VASQUEZ HEALTH CENTER,
INC., a California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No.: RG20078693

Honorable Michael Markman
Department 23

**DECLARATION OF CYNTHIA
BARRAGAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND CLASS
REPRESENTATIVE SERVICE
PAYMENT**

Date: May 29, 2025
Time: 10:00 a.m.
Department: 23

DECLARATION OF CYNTHIA BARRAGAN

I, **Cynthia Barragan**, hereby declare as follows:

1. I am over the age of eighteen, a California resident, and the Plaintiff and Proposed Class Representative in the above-entitled matter. I submit this declaration in support of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement. I have personal knowledge of all the facts stated herein. I could and would competently testify under oath to these facts in court if requested to do so.

2. I was employed by Defendant Tiburcio Vasquez Health Center Inc. ("Defendant") as an hourly-paid, non-exempt California employee during the Class Period. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **5 hours**. I consulted with the attorneys at Lawyers *for* Justice, PC for almost **8.5 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and PAGA representative.

3. I have spent over **19 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys and answering their questions, and providing guidance regarding the duties of hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **10 additional hours** speaking with my attorneys about the case, identifying potential

witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **3.5 hours** reviewing the settlement agreement and asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe I took on a substantial risk in agreeing to serve as the Class Representative despite being made aware that there was no certainty regarding the outcome of the case or how long it would take to recover the wages owed to myself and the other class members.

7. I fully understand the risk I faced in serving as a Class Representative and that doing so could make the case more complex. However, I did so to ensure that not only myself but others would be able to receive what they were owed.

8. Since joining this lawsuit, I have considered the interests of the Class Members just as I would consider my own interests. I understand and have understood throughout the lawsuit that I must put the interests of the Class Members before my own interests. Although I was concerned and afraid about being the Class Representative in this public lawsuit, I decided to put my own interests aside and bring a lawsuit that would be beneficial not just for myself, but for all employees.

9. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me a Class Representative Service Payment in the amount of \$10,000.00 for my active participation in this case and also for agreeing to provide a general release of claims. Taking into consideration the time that I have dedicated to this case, and in exchange for my general release, I believe that this amount is reasonable.

10. I am not related to anyone associated with Lawyers *for* Justice, PC.

11. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a Class Representative Service Payment, as well as my share of the settlement as a class member and aggrieved employee.

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

Executed on 05/01/2025, at Hayward, California.

Electronically Signed: 2025-05-01 09:24:54 UTC - 69.209.109.208
Nintex AssureSignID: 328a0f10-aaa3-4011-a0a7-02a0010820f1

Cynthia Barragan