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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF YOLO

IGNACIO PEREZ, and LISZANDRA
PADILLA, individually, and on behalf of other
members of the general public similarly
situated; and KAREN RIOS, 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;

Plaintiffs,

v.

COMMUNICARE HEALTH CENTER., a
California Corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. CV-2019-469

Honorable Daniel M. Wolk
Department 9

CLASS ACTION

**DECLARATION OF KAREN RIOS IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Annabel Blanchard); Declarations
of Proposed Class Representatives (Ignacio
Perez and Liszandra Padilla) and [Proposed]
Order filed concurrently herewith]

Complaint Filed:	March 7, 2019
FAC Filed:	June 4, 2019
SAC Filed:	September 5, 2019
TAC Filed:	December 12, 2019
FAC Filed:	
Trial Date:	None Set

DECLARATION OF KAREN RIOS

I, **Karen Rios**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case, and I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Communicare Health Centers (“Communicare”) from approximately January 2016 to approximately December 2019 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences at Communicare and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Communicare was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 6 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost 8 hours discussing my situation, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a PAGA action and ultimately be added as a named plaintiff to a class action.

3. As the case progressed, I have spent over 16 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included providing documents concerning my employment with Communicare, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Communicare. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

4. Throughout my involvement in this case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me.

1 I responded to them as quickly as possible and gave them as much information as I could.
2 I spent at least 11 hours speaking with my attorneys about the case, sending them documents,
3 identifying potential witnesses, and also describing policies, practices, and procedures of
4 Communicare.

5 5. I spent about 2 hours reviewing the settlement agreement and about 2 hours asking
6 questions and discussing the potential settlement with my attorneys before signing the settlement
7 agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and tried,
9 to the best of my ability, to seek relief for the aggrieved employees and the State of California.
10 I think my efforts helped to get the result obtained in this case.

11 7. I respectfully request that the Court approve and award me an enhancement
12 payment in the amount of \$7,500.00 for my efforts and active participation in the case and
13 broader release of claims. Taking into consideration the time that I dedicated to this case, I
14 believe that this amount is reasonable.

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

16 9. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this case. The only compensation I will receive is an enhancement
18 payment, if approved by the Court, as well as my share of the settlement as an aggrieved
19 employee.

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

22 Executed this ^{08/24/2021}____ day of August 2021, at Sacramento, California.

23 
24 Electronically Signed: 2021-08-25 00:14:26 UTC - 99.22.254.250
AssureSign® a39f75d0-ade6-4db2-993c-ad8a013d8929

25 Karen Rios
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