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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 IGNACIO PEREZ
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 (Karen
Rios 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 IGNACIO PEREZ

I, **Ignacio Perez**, 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. 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 Communicare Health Centers (“Communicare”) in an hourly-paid, non-exempt employee from approximately April 2016 to approximately August 2016. I decided to seek legal advice about my work experiences with Communicare and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwazian. I wanted to do whatever I could to make sure Communicare paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, 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 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. Since becoming involved in this matter, I have spent over 15 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Communicare, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance 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 any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and 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

1 documents as I could. I spent at least 17 additional hours speaking with my attorneys about the
2 case, identifying potential witnesses, providing my attorneys with documents and information
3 concerning the case, and also describing policies, practices, and procedures of Communicare.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
6 agreement and about 1 hour asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
10 obtained in this case, and as a class representative, I respectfully request that the Court award me
11 an enhancement payment in the amount of \$7,500.00 for my active participation in this case.
12 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
13 reasonable.

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

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as an enhancement payment, as well as my share of the settlement fund as a
18 class member.

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

08/31/2021

21 Executed this ____ day of August 2021, at American Canyon, California.

22  Electronically Signed 2021-08-31 17:39:23 UTC -204.80.242.69
AssureSign® d3d71da6-bafa-43cd-8a10-ad95011f5a2a

23 Ignacio Perez