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Attorneys for Plaintiff
JUSTIN DE LEON, individually and
on behalf of all other Aggrieved Employees

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF VENTURA**

JUSTIN DE LEON, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

VIP EMERGENT CARE, INC. D/B/A VIP
URGENT CARE,
JAIME ALONSO DIAZ, M.D., and
DOES 1 through 50, inclusive,

Defendants.

Case No. 56-2021-00549419-CU-OE-VTA

**DECLARATION OF JUSTIN DE LEON IN
SUPPORT OF MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Complaint Filed: January 21, 2021
Department: 42
Judge: Hon. Henry Walsh

[Filed concurrently with Proposed Order,
Memorandum of Points and Authorities in Support
of Motion and Declaration of Joseph Rose]

Motion Hearing Date: April 6, 2023
Motion Hearing Time: 8:30 a.m.
Reservation Number: 2717446

I, Just De Leon, hereby declare as follows:

1. I have personal knowledge of the matters set forth herein, and I could and would competently testify to them under oath if called as a witness.

2. I brought this PAGA case through my attorneys because I thought it was unfair and improper that Defendants engaged in practices that I believe constitute routine wage and hour violations,

1 specifically regarding daily overtime wages, working off-the-clock, meal periods and rest periods, and
2 related violations. I believe these claims are typical of my coworkers at the Simi Valley location.

3 3. I also had individual claims against Defendants that are unique to me, having been
4 involuntarily discharged in December 2019 after attempting to use sick leave and complaining about a
5 lack of itemized wages statements, having no access to my itemized wage statements during my
6 employment resulting in under-withholding of federal and state income taxes that was not detected until
7 it was too late to correct, and having been asked about a criminal conviction history when I applied for
8 the job before receiving any conditional offer of employment. I separately settled my individual claims
9 with Defendants for \$15,000, inclusive of attorney's fees.

10 4. I participated in many interviews and conversations with my attorneys in this case. We
11 discussed the various employment practices at VIP Emergent Care, Inc. in Simi Valley, California,
12 including the factual details of the above violations that I believe occurred, and in what way they were
13 routine and widespread among other VIP Emergent Care, Inc. employees in Simi Valley, as well as the
14 various documents my co-workers and I may have reviewed or signed regarding scheduled workdays,
15 meal periods, rest periods, and other policies or practices of VIP Emergent Care, Inc. in Simi Valley. I
16 never worked at VIP Emergent Care, Inc. in Tarzana and I have no personal knowledge of Defendants'
17 employment practices there.

18 5. I exchanged numerous emails with my attorneys and provided information as requested,
19 including regarding the subjects noted above. I also assisted my attorneys in reviewing materials and data
20 provided by Defendants in this litigation, and helped my attorneys analyze how the information and data
21 applied to a variety of VIP Emergent Care, Inc. job positions and duties.

22 6. I spent significant time reviewing the pleadings filed in this case, as well as reviewing and
23 explaining issues related to the documents and other discovery that Defendants provided in this case.

24 7. I spent several hours searching for documents and other relevant information to assist in
25 the preparation for the mediation and other events during the pendency of this case.

26 8. I attended a mediation on September 9, 2022, which lasted all day.

27 9. I reviewed the settlement documentation filed with this Court and believe it is in the best
28 interests of the interested parties to resolve this matter under the terms and conditions set forth therein.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
2 and correct, and that this declaration was executed on 3/30/2023, at Moorpark, California.

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eSignature Details

Signer ID:	dmz5Hpr7KYMFMBYbLzman1Pd
Signed by:	Justin De Leon
Sent to email:	deleon0623@gmail.com
IP Address:	172.250.104.87
Signed at:	Mar 30 2023, 10:47 am PDT