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Attorneys for Plaintiff Elias Rios

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

ELIAS RIOS, individually, and on behalf of
other members of the general public
similarly situated;

Plaintiff,

vs.

MOUNTAIN VIEW CHILD CARE, INC.
DBA TOTALLY KIDS SPECIALTY
HEALTHCARE; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CIVSB2121987

Honorable Christian Towns
Department S26

CLASS ACTION

**DECLARATION OF ELIAS RIOS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: April 2, 2025
Time: 8:30 a.m.
Department: S26

Complaint Filed: July 29, 2021
Trial Date: None Set

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1 potential witnesses, providing my attorneys with documents and information concerning the
2 case, and also describing policies, practices, and procedures of Mountain View.

3 5. As far as the settlement is concerned, I spent about **1 hour** reviewing the
4 settlement agreement and asking questions and discussing the potential settlement with my
5 attorneys before signing the settlement agreement.

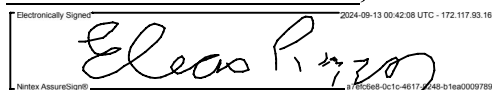
6 6. I believe that I have done everything that my attorneys have asked of me and have
7 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
8 and the State of California. I think my efforts helped to get the result obtained in this case, and
9 as a class and PAGA representative, I respectfully request that the Court award me an incentive
10 award in the amount of \$10,000.00 for my active participation in this case. Taking into
11 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

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

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

19 Executed on this day 09/12/2024, at San Bernardino, California.

20  2024-09-13 09:42:08 UTC - 172.117.93.165
Nintex AssureSign

21 Elias Rios