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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MANUEL BRUNO, 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.

U.S. RENAL CARE, INC., an unknown
business entity; and DOES 1 through
100, inclusive,

Defendant.

Case No.: 2:21-cv-04617-FLA-MRW

Honorable Fernando L. Aenlle-Rocha
Courtroom 6B

CLASS ACTION

**SUPPLEMENTAL
DECLARATION OF MANUEL
BRUNO IN SUPPORT OF
PLAINTIFF'S RENEWED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Plaintiff's Renewed Notice of Motion
and Renewed Motion for Preliminary
Approval of Class Action Settlement;
Declaration of Proposed Class Counsel
(Selena Matavosian); Declaration of
Proposed Class Representative
(Manuel Bruno); and [Further Revised
Proposed] Order filed concurrently
herewith]

Complaint Filed: March 3, 2021
FAC Filed: June 24, 2021
SAC Filed: September 5, 2024
Trial Date: None Set

SUPPLEMENTAL DECLARATION OF MANUEL BRUNO

I, Manuel Bruno, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff 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 am submitting this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (Doc. No. 58) and to provide additional information sought by the Court by way of the Order Granting in Part and Denying in Part Motion for Preliminary Approval of Class Action and PAGA Settlement (Doc. No. 65), in which the Court requested a supplemental declaration attesting that I understand my fiduciary duties to the Class.

3. I understand that by way of my lawsuits against U.S. Renal Care, Inc. ("Renal Care"), I am pursuing claims on behalf of myself for violations of the California Labor Code and the Fair Credit Reporting Act ("FCRA"), putative class claims for violations of the California Labor Code, the California Business and Professions Code, and the FCRA on behalf of putative class members, and a representative claim on behalf of the State of California with respect to alleged aggrieved employees for violations of the California Labor Code pursuant to the Private Attorneys General Act, California Labor Code § 2698, *et seq.* ("PAGA"). I understand that, under the settlement reached regarding my lawsuits, the Class consists of California Class Members and FCRA Class Members. I understand that it is my responsibility to act in the best interests of the Class and not my own. With respect to the lawsuits, I have considered the interests of the Class as well as the State of California just as I would consider my own interests, and I agree that I will not put my own interests ahead of these interests. I have and will continue to actively participate in the lawsuits as necessary, helping in any way I can. I recognize and accept that any resolution of the lawsuits are subject to court review

1 and court approval and must be reasonable as well as fair and in the interests of the
2 Class and the State of California. Should there be a situation in the cases where I
3 must put the interests of the Class and the State of California before my own
4 interests, as they pertain to claims being pursued by way of the cases, I will do so. I
5 understand that I owe fiduciary duties to the Class, and I have an obligation to seek
6 to maximize the amount of recovery on behalf of the Class.

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

9 Executed this 5th day of September 2024, at Azusa, California.

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