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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-MBKx

Honorable Fernando L. Aenlle-Rocha
Courtroom 6B

CLASS ACTION

DECLARATION OF MANUEL BRUNO IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AND MOTION FOR CLASS COUNSEL AWARD AND CLASS REPRESENTATIVE SERVICE AWARD

[Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement; Notice of Motion and Motion for Class Counsel Award and Class Representative Service Award; Declaration of Class Counsel (Selena Matavosian); Declaration of Settlement Administrator (Lisa Pavlik); Table 1; Table 2; [Proposed] Order Granting Final Approval of Class Action and PAGA Settlement and Judgment; and [Proposed] Order Awarding Class Counsel Award and Class Representative Service Award filed concurrently herewith]

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Date: December 5, 2025
Time: 2:00 p.m.
Courtroom: 6B

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

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 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 have been employed by U.S. Renal Care, Inc. (“Renal Care”) in an hourly-paid, non-exempt position from approximately March 2020 to approximately November 2020. I decided to seek legal advice about my work experiences with Renal Care. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure that Renal Care was held accountable for not paying its non-exempt, hourly-paid employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 10 hours. Afterwards, I consulted with the attorneys at Lawyers *for* Justice, PC for 9 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to commence the lawsuit and be a named plaintiff, class representative, and eventually PAGA representative.

3. I have spent over 15 hours meeting and communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Renal Care, reviewing documents with my attorneys and answering their questions, and providing guidance regarding the duties of hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Renal Care. I routinely checked in with my attorneys

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1 and their staff to make sure they had all of my most current information and any
2 additional information that I had obtained.

3 4. I was available to answer any questions my attorneys had, and was
4 available to speak and meet with my attorneys whenever they needed me. I
5 responded to them as quickly as possible, gave them all the information I had, and
6 helped identify as many documents as I could. I spent at least 10 additional hours
7 speaking with my attorneys about the case, identifying potential witnesses,
8 providing my attorneys with documents and information concerning the case, and
9 also describing policies, practices, and procedures of Renal Care.

10 5. As far as the settlement is concerned, I was available to review
11 documents and answer any questions my attorneys had. I spent about 3 hours
12 reviewing the settlement documents and about 3 hours asking questions and
13 discussing the settlement with my attorneys before signing the settlement
14 agreement.

15 6. I believe that I have done everything that my attorneys have asked of
16 me and have tried, to the best of my ability, to represent the class and seek relief
17 for the aggrieved employees and the State of California. I think my efforts have
18 helped to obtain the result in this case, and as a class and PAGA representative, I
19 respectfully request that the Court award me a Service Award in the amount of
20 \$7,500.00 for my active participation in this case. Taking into consideration the
21 time that I have dedicated to this case, I believe that this amount is reasonable.

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

23 8. I have not entered into any undisclosed agreements, nor have I
24 received any undisclosed compensation in this case. The only compensation I will
25 receive is whatever amount the Court awards as a Service Award, as well as my
26 share of the settlement fund as a class member and aggrieved employee.

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

08/15/2023

Executed this _____ day of August 2023, at Azusa, California.


Nintex AssureSign® 585c7e91-36d5-4897-bb73-405801670b9f

Manuel Bruno

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