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Attorneys for Plaintiffs
YOXY JURADO and HECTOR CHAVEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – SPRING STREET

YOXY JURADO, individually and on behalf
of others similarly situated and as an aggrieved
employee and Private Attorney General, and
HECTOR CHAVEZ, individually and on
behalf of others similarly situated and as an
aggrieved employee and Private Attorney
General;

Plaintiffs,

vs.

AEQUOR HEALTHCARE SERVICES, LLC,
a New Jersey limited liability company;
AEQUOR HEALTHCARE SERVICES, INC.,
a Nevada corporation; THERAPY STAFF,
LLC, a Delaware limited liability company;
UNITED STAFFING SOLUTIONS, INC., an
unknown business entity; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 21STCV06001

*Assigned for All Purposes to: Hon. Stuart M.
Rice, Dept. 1*

CLASS ACTION

**DECLARATION OF HECTOR
CHAVEZ IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Hearing Date: August 21, 2023
Hearing Time: 4:00 p.m.
Dept: 1

Complaint Filed: February 11, 2021
Trial Date: None Set

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1. I am over 18 years of age and a resident of California. I am one of the Class and PAGA Representatives in the action entitled *Jurado, et al. v. Aequor Healthcare Services, LLC, et al.*, Los Angeles County Superior Court, Case No. Case No. 21STCV06001. I have personal knowledge of the facts stated herein and if called as a witness I could and would competently testify thereto.

3. In or about November 2021, I decided to seek legal advice about my experiences working for Defendants and about pursuing my grievances against them. I contacted Class Counsel and spoke with their attorneys. Afterwards, I investigated complex wage-and-hour actions and representative actions pursuant to the Private Attorneys General Act of 2004 (“PAGA”) on my own and then reached out to Class Counsel again to discuss my situation, and what it meant to be a named plaintiff and representative. I wanted to take steps to make sure that Defendants were held accountable for not compensating their hourly employees for all time worked and failing to comply with California’s wage and hour laws.

5. As part of becoming a Class and PAGA Representative, I understood that I had a responsibility to the Class, PAGA Members, and State of California.

6. My duties were explained to me by my attorneys. I understood that in representing the interests of other employees, I must consider their interest above my own interests in the Action. I am not aware of any interests that I have had that are contrary to the interests of the

1 proposed Class Members. I also do not know of any conflict of interest that would keep me from
2 adequately representing the Class or the PAGA Members.

3 7. I was also aware that becoming a Class and PAGA Representative could involve
4 additional work including searching for documents, my deposition being taken, and that I might
5 have to take time off to participate in the Action. I still agreed to serve as the Class and PAGA
6 Representative in order to help others recover these wages and penalties.

7 8. After agreeing to serve as a Class and PAGA Representative, I spoke with my
8 attorneys extensively. Since my claims were filed, I have spent considerable time meeting with
9 my attorneys regarding the Action and fulfilling my responsibilities as a Class and PAGA
10 Representative which included searching for documents I might have related to the Action,
11 reviewing documents with my attorneys, discussing issues regarding Defendants' policies,
12 practices, and procedures, and providing guidance regarding the duties of other non-exempt
13 employees and generally my employment with Defendants. I also helped my attorneys develop a
14 strategy as to what documents and information to obtain from Defendants. I routinely checked in
15 with my attorneys and their staff to make sure they had all of my most current information and
16 any additional information that I had obtained.

17 9. I wanted to do whatever I could to make sure Defendants paid me and other
18 employees what I believe was owed to us for all the hours we worked and for what I believe were
19 non-compliant meal and rest breaks. I believed that the Action could help not only myself but
20 others who I believe had similar difficulties working for Defendants.

21 10. As the Action moved forward, I provided substantial information regarding
22 Defendants' policies, practices, and procedures. I had several additional phone calls with my
23 attorneys throughout the Action and attempted to respond promptly whenever Counsel contacted
24 me or needed additional information. I spoke with my attorneys for many hours, including
25 extensively before the mediation and attempted to provide any help I could on the Action. I
26 proactively monitored the status of the Action and reached out to my Counsel regarding ongoing
27 developments.
28

1 11. When the Action settled, I reviewed the Settlement Agreement and discussed its
2 terms with my attorneys. When I had additional questions about the Settlement, I contacted my
3 attorneys and reviewed the provisions of the Settlement Agreement where I was unclear. I kept
4 in contact with my attorneys throughout the settlement process and will continue to actively
5 participate in the Action and monitor the Action until it is finalized.

6 12. I believe I took on a substantial risk in agreeing to serve as the Class and PAGA
7 Representative despite being made aware that there was no certainty regarding the outcome of
8 the Action or how long it would take to recover the wages owed to myself and the other Class
9 Members and PAGA Members.

10 13. Although I was concerned and afraid about being the representative in a public
11 lawsuit, I decided to put my own interests aside and bring a lawsuit that would be beneficial not
12 just for myself, but for all employees. I have not yet suffered any adverse consequences as a result
13 of this lawsuit, but neither have I received any benefit for representing the Class, the PAGA
14 Members, or for the help I provided my attorneys.

15 14. I have not entered into any undisclosed settlement agreements, nor have I received
16 any undisclosed compensation in the Action. The only compensation I will receive is whatever
17 amount the Court awards as a Class Representative Enhancement Payment, as well as my share
18 of the settlement fund as a Class Member.

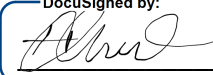
19 15. Furthermore, as part of the Settlement, I have agreed to a much broader individual
20 release than the more limited release made by other Class Members.

21 16. I believe that I have done everything that my attorneys have asked of me and have
22 tried to the best of my ability to represent the Class Members, State of California, and PAGA
23 Members. I think my efforts helped to get the results obtained in the Action, and as the Class and
24 PAGA Representative, I respectfully request that the Court award me an Enhancement Payment
25 in the amount of \$7,500.00 for my active participation in the Action. Taking into consideration
26 the time I have dedicated to the litigation, the risks I took in order to recover on behalf of not just
27 myself but others, and the general release I have entered on my own behalf, I believe that this
28 amount is reasonable.

1 17. I am not related to anyone associated with Protection Law Group, LLP.

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

4 Executed on 8/2/2023.

5 DocuSigned by:
6 
7 5E8F849ACA9246D
8 Hector Chavez