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Attorneys for Plaintiff
HECTOR ALMAZAN

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

HECTOR ALMAZAN, individually, and on
behalf of others similarly situated and as an
aggrieved employee and Private Attorney
General,

Plaintiff,

vs.

HATHAWAY-SYCAMORES CHILD AND
FAMILY SERVICES, a California non-
profit corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 21STCV12008

*Assigned for All Purposes to: Hon. Elihu M.
Berle, Dept. 6*

CLASS ACTION

**DECLARATION OF HECTOR
ALMAZAN IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: May 29, 2025

Hearing Time: 9:00 a.m.

Dept: 6

Complaint Filed: March 29, 2021

Trial Date: None Set

1 the PAGA claims, most of these penalties would be paid to the State. I also do not know of any
2 conflict of interests that would keep me from adequately representing the Class or the PAGA
3 Members.

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

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

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

24 10. As the case moved forward, I provided substantial information regarding
25 Defendant's policies, practices, and procedures. I had several additional phone calls with my
26 attorneys throughout the Action and attempted to respond promptly whenever Counsel contacted
27 me or needed additional information. I spoke with my attorneys for many hours, including
28 extensively before the mediation and attempted to provide any help I could on the Action. I

1 proactively monitored the status of the case and reached out to my Counsel regarding ongoing
2 developments.

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

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

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

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

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

23 16. I believe that I have done everything that my attorneys have asked of me and have
24 tried to the best of my ability to represent the Class Members, State of California, and PAGA
25 Members. I think my efforts helped to get the results obtained in the Action, and as the Class
26 and PAGA Representative, I respectfully request that the Court award me an Enhancement
27 Payment in the amount of \$7,500.00 for my active participation in the Action. Taking into
28 consideration the time I have dedicated to the litigation, the risks I took in order to recover on

1 behalf of not just myself but others, and the broader release I have entered on my own behalf,
2 I believe that this amount is reasonable.

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

4 18. As part of the Settlement, I understand that the Parties selected APEX Class
5 Action, LLC ("APEX") as the neutral third-party Settlement Administrator to provide notice
6 to the Class Members and to distribute the Settlement pursuant to its terms. I have no actual
7 or potential conflicts of interests with APEX.

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

10
11 Executed on 04/28/2025 .

12 DocuSigned by:

13 

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15 HECTOR ALMAZAN