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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

TERESA BOND, JESSE ZAMARRIPA,
individually, and on behalf of other members
of the general public similarly situated;
REYNEIRO LARIOS, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act,

Plaintiffs,

v.

HANGER, INC., an unknown business entity;
HANGER ORTHOPEDIC GROUP, INC., an
unknown business entity; HANGER
PROSTHETICS & ORTHOTICS, INC., a
Delaware corporation; HANGER
PROSTHETICS & ORTHOTICS WEST,
INC., a California corporation; HANGER
FABRICATION NETWORK, LLC, an
unknown business entity; and DOES 2 through
100, inclusive,

Defendants.

Case No.: 34-2021-00303204-CU-OE-GDS

Honorable Lauri A. Damrell
Department 28

CLASS ACTION

**DECLARATION OF REYNEIRO
LARIOS IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Selena Matavosian); Declarations
of Proposed Class Representatives (Teresa
Bond and Jesse Zamarripa); and [Proposed]
Order filed concurrently herewith.]

Reservation ID: A-303204-001
Date: August 4, 2023
Time: 9:00 a.m.
Department: 28

Complaint Filed: June 23, 2020
FAC Filed: December 27, 2020
Jury Trial Date: None Set

DECLARATION OF REYNEIRO LARIOS

I, **Reyneiro Larios**, 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 was employed by Hanger Prosthetics & Orthotics, Inc. ("Hanger") as an hourly-paid technician from approximately January 2005 to approximately January 2021. I decided to seek legal advice about my work experiences with Hanger and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Hanger paid me and other employees what was owed to us for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 8 hours discussing my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA") and complex wage-and-hour class actions in general, and what it meant to bring a PAGA action and a class action lawsuit as a named plaintiff and class representative.

3. I have spent over 17 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative and class representative, which included gathering documents concerning my employment with Hanger, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Hanger. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout the case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to

1 them as quickly as possible and gave them as much information and identified as many
2 documents as I could. I spent at least 8 additional hours speaking with my attorneys about the
3 case, identifying potential witnesses, providing my attorneys with documents and information
4 concerning the case, and also describing policies, practices, and procedures of Hanger.

5 5. As far as the settlement is concerned, I was available to review settlement-related
6 documents and answer any questions my attorneys had. I spent about 3 hours reviewing the
7 settlement agreement and about 4 hours asking questions and discussing the potential settlement
8 with my attorneys before executing the settlement agreement.

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

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

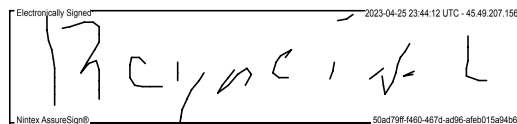
17 8. I have not entered into any undisclosed agreements, nor have I received any
18 undisclosed compensation in this case. The only compensation I will receive is whatever amount
19 the Court awards as an incentive award, as well as my share of the settlement as a class member
20 and aggrieved employee.

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

04/25/2023

23 Executed this ____ day of April 2023, at Pico Rivera, California.

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An electronic signature box containing a handwritten signature that appears to read "Reyneiro Larios". Above the signature, it says "Electronically Signed" and "2023-04-25 23:44:12 UTC - 45:49:207.156". Below the signature, it says "Nintex AssureSign®" and "50ed79ff-6460-467d-ad96-afeb015a94b6".

Reyneiro Larios