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Attorneys for Plaintiffs and the Class

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

ARNOLD SAURIN, 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;
AJAYZEAU BROWN, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiffs,

vs.

VALLEY PRESBYTERIAN HOSPITAL, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendant.

Case No.: 21STCV22597

Honorable William F. Highberger
Department SSC10

CLASS ACTION

**DECLARATION OF AJAYZEAU BROWN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND ENHANCEMENT
PAYMENTS**

[Plaintiffs' Motion for Final Approval of Class
Action Settlement, Attorneys' Fees and Costs,
and Enhancement Payments; Plaintiffs'
Opposition to Objection to Settlement Filed by
Class Member Mohammed Tekfaoui;
Declarations of Class Counsel (Edwin
Aiwazian, Joanna Ghosh, and Brian J. St.
John); Declaration of Class Representative
(Arnold Saurin); Declaration of Settlement
Administrator (Jennifer Beliveau); and
[Proposed] Final Approval Order and Judg-
ment filed concurrently herewith]

Date: March 11, 2024
Time: 11:00 a.m.
Department: SSC10

Complaint Filed: June 15, 2021
FAC Filed: August 30, 2023
Trial Date: None Set

DECLARATION OF AJAYZEAU BROWN

I, **Ajayzeau Brown**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff in *Arnold Saurin, et al. v. Valley Presbyterian Hospital*, Superior Court of California for the County of Los Angeles, Case No. 21STCV22597. 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 Defendant Valley Presbyterian Hospital (“Defendant”) in an hourly-paid, non-exempt certified nurse assistant position from approximately February 2019 to March 2020. I contacted Lawyers *for* Justice, PC after deciding to seek legal advice about my work experiences with Defendant. I spoke with attorneys there about pursuing my grievances, as I wanted to do whatever I could to make sure Defendant was held accountable for their practice of not properly compensating their employees. 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 5 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 4 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 be a named plaintiff and class representative.

3. I have spent over 14 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering their questions, providing guidance regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I frequently checked in with my attorneys and their staff to make sure that they had all my most current information and any additional information that I had obtained.

4. Throughout the pendency of the case, I was available to answer any questions my attorneys had and remained available to speak and meet with my attorneys whenever they

1 needed me. I responded to them as quickly as possible and gave them as much information and
2 identified as many documents as I could. I spent at least 9 additional hours speaking with my
3 attorneys about the case, identifying potential witnesses, providing my attorneys with
4 documents and information concerning the case, and also describing policies, practices, and
5 procedures of Defendants.

6 5. As far as the settlement is concerned, I was available to review documents and
7 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
8 agreement and about 2 hours asking questions and discussing the potential settlement, mediation
9 and outcome thereof, and settlement paperwork, with my attorneys before signing the settlement
10 agreement.

11 6. I believe that I have done everything that my attorneys have asked of me and have
12 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
13 obtained in this case, and as a class representative, I respectfully request that the Court award
14 me a class representative service award in the amount of \$7,500.00 for my active participation
15 in this case. Taking into consideration the time that I have dedicated to this case, I believe that
16 this amount is reasonable.

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

18 8. I have not entered into any undisclosed agreements, nor have I received any
19 undisclosed compensation in this case. The only compensation I will receive is whatever
20 amount the Court awards as an enhancement award, as well as my individual settlement
21 payment.

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

24 Executed this 02/14/2023 day of February 2023, at Sylmar, California.

25 
26 Electronically Signed: 02/14/2023 02:00:20 DTC - 47.154.254.238
Nintex AssureSign® 68af19aa-c66a-46bb-a85a-afaa001485f7

27 Ajayzeau Brown
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