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Superior Court of California,
County of Los Angeles
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David W. Slayton,
Executive Officer/Clerk of Court,
By G. Carini, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
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;

Plaintiff,

vs.

VALLEY PRESBYTERIAN HOSPITAL, A
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 21STCV22597

Honorable William F. Highberger
Department SSC10

CLASS ACTION

**DECLARATION OF AJAYZEAU BROWN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Complaint Filed: June 15, 2021
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 02:15:02.00:20 DTCT - 47.154.254.238
Nintex AssureSign® 68af19aa-c66a-46bb-ad6a-afca001485f7

27 Ajayzeau Brown
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