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

KRISTAL LOPEZ, individually, on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

HUGHSON SAMARITAN VILLAGE., a
California corporation; SAMARITAN
VILLAGE, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No. CV-21-003611

Honorable John R. Mayne
Department 21

**DECLARATION OF KRISTAL LOPEZ
IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF
PRIVATE ATTORNEYS GENERAL
ACT (CAL. LAB. CODE § 2698, ET
SEQ.) SETTLEMENT AGREEMENT
AND AWARD OF ATTORNEYS' FEES
AND COSTS, GENERAL RELEASE
FEE, AND SETTLEMENT
ADMINISTRATION COSTS**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Lab.
Code § 2698, Et Seq.) Settlement Agreement
and Award of Attorneys' Fees and Costs,
General Release Fee, and Settlement
Administration Costs; Declaration of
Plaintiff's Counsel (Edwin Aiwazian); and
[Proposed] Order and Judgment filed
concurrently herewith]

Date: November 17, 2022
Time: 8:30 a.m.
Department: 21

Complaint Filed: July 12, 2021
Trial Date: None Set

DECLARATION OF KRISTAL LOPEZ

I, **Kristal Lopez**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff 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 Hughson Samaritan Village and Samaritan Village (together, “Defendants”) as an hourly-paid, non-exempt from approximately May 2018 to approximately January 2020. I decided to seek legal advice about my work experiences at Defendants and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Defendants were held accountable for not compensating aggrieved employees 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 almost **6 hours** discussing my situation, representative action lawsuits under the Private Attorneys General Act (“PAGA”) in general, and what it meant to bring a PAGA action.

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

4. 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 them as quickly as possible and gave them as much information as I could. I spent at least **12 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my

1 attorneys with documents and information concerning the case, and also describing policies,
2 practices, and procedures of Defendants.

3 5. I spent about **4 hours** reviewing the settlement agreement and about **3 hours**
4 asking questions and discussing the potential settlement with my attorneys before signing the
5 settlement agreement.

6 6. I believe that I have done everything that my attorneys have asked of me and have
7 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
8 California. I think my efforts helped to get the result obtained in this case.

9 7. I respectfully request that the Court approve and award me a general release fee in
10 the amount of \$7,500.00 for my efforts and active participation in this case and broader release
11 of claims. Taking into consideration the time that I have dedicated to this case to seek relief for
12 the aggrieved employees and the State of California, I believe that this amount is reasonable.

13 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

14 9. I have not entered into any undisclosed agreements, nor have I received any
15 undisclosed compensation in this case. The only compensation I will receive is a general release
16 fee, if approved by the Court, as well as my share of the settlement as an aggrieved employee.

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

09/09/2022

19 Executed this ____ day of September 2022, at Turlock, California.

20 Electronically Signed: 2022-09-09 15:35:57 UTC - 172.58.75.110
Kristal Lopez
Nintex AssureSign® 02cdfc9c-10d4-46b3-b006-af0a0156d0a

21 Kristal Lopez