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Attorneys for Plaintiffs

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

MARITZA TORRES, ANNETTE OLVERA
NUNEZ, individually, and on behalf of other
members of the general public similarly
situated; JESSICA SALCEDO, 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;

Plaintiffs,

vs.

CLINICA SIERRA VISTA, a California
corporation; and DOES 1 through 100,
inclusive,

Defendant.

Case No.: BCV-19-101966

Honorable Bernard C. Barmann, Jr.
Department H
1215 Truxton Ave. Bakersfield, CA 93301

CLASS ACTION

**DECLARATION OF MARITZA
TORRES IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: November 7, 2024
Time: 8:30 a.m.
Department: H

Complaint Filed: July 16, 2019
Trial Date: None Set

DECLARATION OF MARITZA TORRES

I, **Maritza Torres**, 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 Defendant Clinica Sierra Vista from approximately September 1997 to approximately February 2018, as an hourly-paid Medical Assistant I, Program Site Assistant, Medical Assistant II, Cancer Detection Program Case Manager, Patient Navigator, Referral Clerk, and Referral Coordinator. I decided to seek legal advice about my work experience with Clinica Sierra Vista. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Clinica Sierra Vista paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. I consulted with the attorneys at Lawyers *for* Justice, PC for approximately **1.5 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **10 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included gathering documents concerning my employment with Clinica Sierra Vista, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly-paid employees and helping develop a strategy as to what documents and information to obtain from Clinica Sierra Vista. 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. 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 and identified as many documents as I could. I spent at least **3 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Clinica Sierra Vista. During the discovery phase of litigation, I spent approximately **4 additional hours** reviewing Defendant's discovery requests, location documents, and providing documents and responses to my attorneys.

5. As far as the settlement is concerned, I spent about **1 hour** reviewing the settlement agreement and asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

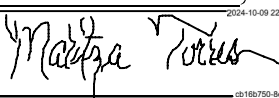
6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me an incentive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

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

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement as a class member.

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

Executed on this day 10/09/2024, at Bakersfield, California.

Electronically Signed

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Maritza Torres