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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

PRISCILLA DE LA CRUZ CORONA,
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.

WEST POINT MEDICAL CENTER, an
unknown business entity; COMPREHENSIVE
PRIMARY CARE MEDICAL, an unknown
business entity; and COMPREHENSIVE
PRIMARY CARE MEDICAL ASSOCIATES,
INC., dba WEST POINT MEDICAL
CENTER, a California corporation; DOES 2
through 100, inclusive,

Defendants.

Case No.: CIVDS2009703

Honorable David S. Cohn
Department S26

CLASS ACTION

**DECLARATION OF PRISCILLA DE LA
CRUZ CORONA IN SUPPORT OF
PLAINTIFF'S 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
(Edwin Aiwazian); and [Proposed] Order filed
concurrently herewith]

Date: March 11, 2022
Time: 9:00 a.m.
Department: S26

Complaint Filed: June 3, 2020
FAC Filed: December 20, 2021
Jury Trial Date: None Set

DECLARATION OF PRISCILLA DE LA CRUZ CORONA

I, **Priscilla De La Cruz Corona**, 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 Comprehensive Primary Care Medical Associates, Inc., dba, West Point Medical Center, erroneously sued as defendants West Point Medical Center and Comprehensive Primary Care Medical (“West Point Medical Center”) as an hourly-paid, non-exempt employee from approximately October 2017 to approximately March 2018. I decided to seek legal advice about my work experiences with West Point Medical Center and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwazian. I wanted to do whatever I could to make sure West Point Medical Center 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. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 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, class representative, and PAGA representative.

3. I have spent over 18 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with West Point Medical Center, reviewing documents with my attorneys, answering questions and providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and

1 information to obtain from West Point Medical Center. I routinely checked in with my attorneys
2 and their staff to make sure that they had all of my most current information and any additional
3 information that I had obtained.

4 4. Throughout the case, I was available to answer any questions my attorneys had,
5 and available to speak and meet with my attorneys whenever they needed me. I responded to
6 them as quickly as possible and gave them as much information and identified as many
7 documents as I could. I spent at least 12 additional hours speaking with my attorneys about the
8 case, identifying potential witnesses, providing my attorneys with documents and information
9 concerning the case, and also describing policies, practices, and procedures of West Point
10 Medical Center.

11 5. As far as the settlement is concerned, I was available to review documents and
12 answer any questions my attorneys had. I spent about 4 hours reviewing the settlement
13 agreement and about 3 hours asking questions and discussing the potential settlement with my
14 attorneys before signing the settlement agreement.

15 6. I believe that I have done everything that my attorneys have asked of me and have
16 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
17 and the State of California. I think my efforts helped to get the result obtained in this case, and
18 as a class and PAGA representative, I respectfully request that the Court award me an
19 enhancement payment in the amount of \$7,500.00 for my active participation in this case.
20 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
21 reasonable.
22

23 7. I am not related to anyone associated with Lawyers *for* Justice, PC.
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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 fund as a class member and as an aggrieved employee.

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

01/13/2022

Executed this ____ day of January 2022, at Bloomington, California.

Electronically Signed: 2022-01-13 18:02:06 UTC - 172.58.28.231

Priscilla De La Cruz Corona

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Priscilla De La Cruz Corona