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Attorneys for Plaintiffs

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

GUADALUPE GUARISTA, individually, on
 behalf of all others similarly situated, and on
 behalf of the State of California and other
 aggrieved persons; and TENISHA KATHERINE
 HOWARD and JENNIFER LOPEZ-
 TRIGUEROS, individually, and on behalf of all
 others similarly situated,

Plaintiffs,

v.

UROLOGIC INSTITUTE OF THE HIGH
 DESERT, INC., a corporation, and DOES 1
 through 10, inclusive,

Defendants.

Case No.: CIVSB2125029

[*Consolidated with Case No. CIVSB213340*]

CLASS & REPRESENTATIVE ACTION

[*Assigned to: Hon. Jessica Morgan, Dept. S-26*]

**DECLARATION OF PLAINTIFF
 JENNIFER LOPEZ-TRIGUEROS IN
 SUPPORT OF PLAINTIFFS' MOTION
 FOR PRELIMINARY APPROVAL OF
 CLASS ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF JENNIFER LOPEZ-TRIGUEROS

I, Jennifer Lopez-Trigueros, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am one of the named Plaintiffs in this action and submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. I am hopeful the Court will approve my request for a \$1,000 service payment because of the time and effort I spent on this case.

4. I am a former employee of Urologic Institute of the High Desert, Inc. ("Defendant"). I worked for Defendant from approximately July 2020 to approximately February 2022 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendant's policies and practices that have been alleged as unlawful in the First Amended Consolidated Class & Representative Action Complaint.

5. I reached out to Wilshire Law Firm because I felt as if I was not being paid correctly for all the hours that I worked and was not provided with all my mandated meal and rest breaks. At the time I reached out to Wilshire Law Firm, I was informed that there was a pending class action lawsuit against Defendant, which was initiated by Plaintiff Guadalupe Guarista in August 2021. I was hopeful that my assistance would add value to the case and perhaps improve Defendant's policies so that the working conditions of the employed workers would improve. I also understood that joining the lawsuit at a later time as a class representative meant that I had to represent the best interests of the class.

1 6. I have actively participated in the litigation of this action. At the time I contacted
2 Wilshire Law Firm, I provided my attorneys a detailed account of the facts related to my
3 employment with Defendant, including, but not limited to, my belief that Defendant had a policy
4 and practice of not providing its employees with California compliant meal and rest periods and
5 requiring its employees to work “off-the-clock” during unpaid meal periods. Additionally, I
6 provided my counsel with documentation in support of the claims brought against Defendant.
7 These documents, along with the anecdotes I shared regarding my employment, assisted my
8 attorneys in better understanding Defendant’s policies and practices. I also regularly
9 communicated with my attorneys and staff members of Wilshire Law firm regarding the status of
10 the lawsuit and whether I could be of assistance.

11 7. My attorneys explained to me the risks and benefits of being added to the lawsuit as
12 a class representative. I understood the risks, both professionally and financially, associated with
13 pursuing a class action case and acting as one of the class representatives. I further understood
14 that pursuing the case as a class action, rather than individually, meant that it would take
15 substantially longer as a result of the multi-step approval process as mandated by the California
16 courts. Although I was made aware that there was a possibility that I could receive nothing at the
17 end, I believed that it was important to ensure that Defendant followed the law with respect to all
18 of its hourly-paid, non-exempt employees. Additionally, I understood that it was my responsibility
19 to act in the best interests of the Class and not just myself. In that respect, I understood my duties
20 and responsibilities to the proposed Class and carried out and will continue to carry out those duties
21 as necessary.

22 8. I reviewed (and ultimately signed) the Class Action and PAGA Settlement
23 Agreement in full and my attorneys answered all the questions I had. I believe the settlement terms
24 and allocations are fair, adequate, and reasonable given the strength of the class claims and
25 Defendant’s defenses.

26 9. I estimate that I spent approximately 5 hours searching for and collecting documents
27 related to my employment, speaking with Wilshire Law Firm throughout the litigation, discussing
28 the particulars and reasonableness of the settlement, and reviewing/signing documents related to

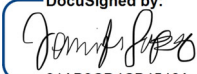
1 the settlement. As such, I respectfully request that the Court award me a \$1,000 service payment
2 based on my involvement in the case and the benefits provided for the Class.

3 10. I have no conflicts of interest with any class member or the Settlement
4 Administrator, ILYM Group, Inc.

5 11. I am not aware of any other pending matter or action asserting claims that will be
6 extinguished or adversely affected by the Settlement.

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

9 Executed on 9/3/2024, at _____, City _____, California.

10 DocuSigned by:
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13 Jennifer Lopez-Trigueros
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Guarista v. Urologic Institute of The High Desert, Inc., et al.
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PROOF OF SERVICE