

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)

phaines@haineslawgroup.com

Sean M. Blakely (SBN 264384)

sblakely@haineslawgroup.com

Alexandra R. McIntosh (SBN 320904)

amcintosh@haineslawgroup.com

2155 Campus Drive, Suite 180

El Segundo, California 90245

Tel: (424) 292-2350

Fax: (424) 292-2355

Sahag Majarian II (State Bar No. 146621)

Garen Majarian (State Bar No. 334104)

LAW OFFICE OF SAHAG MAJARIAN, II

18250 Ventura Boulevard

Tarzana, California 91356

Telephone: (818) 609-0807

Facsimile: (818) 609-0892

Attorneys for Plaintiffs

[Additional Attorneys on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

LAURA LOPEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

BARLOW RESPIRATORY HOSPITAL, a
California corporation and DOES 1 through
100,

Defendants.

Case No. 21STCV29754 (Related to Case
Nos. 22STCV03831; 22STCV34472)

*[Assigned for all purposes to Hon. Carolyn
B. Kuhl, Dept. SSC-12]*

**DECLARATION OF PLAINTIFF
LAURA LOPEZ IN SUPPORT OF
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: July 9, 2024

Time: 10:30 a.m.

Dept.: 12

Action Filed: August 12, 2021

Trial Date: None set

Joseph Lavi, Esq. (SBN 209776)
Vincent C. Granberry, Esq. (SBN 276483)
Tara Yousif, Esq. (SBN 340424)
LAVI & EBRAHIMIAN, LLP
8889 W. Olympic Blvd., Suite 200
Beverly Hills, California 90211
Telephone: (310) 432-0000
Facsimile: (310) 432-0001
Email: jlavi@lelawfirm.com
vgranberry@lelawfirm.com
tyousif@lelawfirm.com
wht2@lelawfirm.com

Attorneys for Plaintiffs

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I, LAURA LOPEZ, declare as follows:

1. I am an individual over the age of 18 and am the named plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant Barlow Respiratory Hospital (“Barlow”) as a non-exempt employee in the housekeeping department from approximately 2015 until approximately July 2021. During that time, I was subject to Barlow’s wage and hour policies and practices at issue in this case.

3. While working for Barlow, it is my understanding that Barlow would round my hours worked such that I was paid in six-minute increments. I believe this caused me to be underpaid for the hours I worked. Also for at least a portion of my employment, it is my understanding that Barlow paid me at the wrong hourly rate, which also caused me to be underpaid.

4. While working for Barlow I often did not receive a meal period until after the end of my fifth hour of work and my meal periods were often less than a full 30 minutes due to work demands. I also did not always receive a second meal period when I worked shifts of more than 10.0 hours. My workload while I was working for Barlow also often prevented me from taking my 10-minute rest breaks. I do not believe that Barlow paid me a meal period premium when my meal periods were late, short, or missed or a rest period premium when I was not able to take my 10-minute breaks.

5. As a result of these violations, it is my understanding that I did not receive accurate and complete itemized wage statements and that I was not paid all final wages owed to me by Barlow.

6. I have been actively involved in this case since I first retained Haines Law Group, APC (“HLG”) in July 2021. Since then, and without waiving the attorney-client privilege, I have had many discussions with the attorneys and staff at HLG, including regarding Barlow’s wage

1 and hour policies and my claims in this case, litigation strategy, potential witnesses, updates on
2 how the case was proceeding, and how I could help the case and the potential Settlement Class
3 members. I also provided information and documents to my attorneys to assist them in mediation
4 and negotiating the Settlement. I also spent time reviewing and discussing the Settlement
5 Agreement as well as other documents from my attorneys, and reviewing my own records for
6 documents that would be potentially relevant to the case. In total, I estimate that I have spent
7 approximately 30-40 hours in connection with this case since I first retained HLG in 2021.

8 7. When I retained HLG and decided to pursue this case, I understood it could benefit
9 former and current employees of Barlow by helping to recover unpaid wages, meal and rest period
10 premiums, and other penalties on their behalf. I also knew there was a risk I could be liable for
11 Barlow's costs if we lost the case. I also understood that filing a lawsuit is a public record.
12 However, I accepted those risks because I wanted Barlow to pay its current and former employees
13 properly and to provide them proper breaks. As far as I am aware, I have no actual or potential
14 conflicts with any of the Settlement Class members.

15 8. As part of the proposed Settlement, I have also agreed to a full release of claims
16 related to my employment with Barlow that extends beyond the release of claims applicable to
17 other Settlement Class members.

18 9. I understand that my attorneys will request that the Court approve an enhancement
19 payment of \$7,500 for my efforts on behalf of the Settlement Class members, as well as my full
20 release of claims. I believe this amount is reasonable based on the amount of time and effort I
21 have devoted to this case, the amount of time that has passed since my lawsuit was first filed in
22 August 2021, as well as the risks I have undertaken as a class representative, as described above.
23 This proposed enhancement payment is not contingent upon me supporting the proposed
24 Settlement.

25 10. I do not have any personal or financial interest, involvement and/or relationship
26 with the proposed *cy pres* recipient, CASA of Los Angeles.

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1 I declare under penalty of perjury under the laws of the State of California and the United
2 States that the foregoing is true and correct. Executed on May 14, 2024 at
3 Palmdale _____, California.

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Laura Lopez (May 14, 2024 12:47 PDT)
Laura Lopez