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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

GERARDO SANCHEZ, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

DUTTON HOME SERVICES, LLC, a
California corporation; and DOES 1
through 100,

Defendants.

CASE NO. 22STCV01834

*[Case assigned for all purposes to the Hon.
Maren E. Nelson, Dept. 17]*

**DECLARATION OF GERARDO
SANCHEZ IN SUPPORT OF APPROVAL
OF CLASS ACTION SETTLEMENT**

Action Filed: January 14, 2022

Trial Date: None Set

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I, Gerardo Sanchez, 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 Dutton Home Services, LLC (“Dutton”) in California from February 18, 2019, to March 12, 2021. During my employment, Dutton required me to clock out for a meal period even when I was not able to take one. Oftentimes I was too busy going from job to job to stop and take an uninterrupted meal period. In those instances I was expected to clock out for a meal period anyway and eat lunch on my way to the next job or make up my meal period sometime later in the day. Likewise when I worked longer shifts (over 10 hours) I was not provided with the opportunity to take an additional meal period. Dutton did not pay me for the time I spent working off-the-clock during meal periods. I also do not believe I was always paid a meal period premium when I was not able to take my lunch or had to delay my lunch until later in the day. Also due to the strict appointment schedule Dutton required me to keep, I was not able to take my rest periods throughout the day. I do not believe I was paid any rest period premiums when I did not receive my 10-minute rest periods. While working for Dutton, I used a company cell phone and iPad and occasionally earned cash bonuses in addition to my normal pay. Because of these issues, I believe Dutton did not issue me accurate wage statements or pay me all wages I was owed when I left.

3. I started this lawsuit against Dutton because I wanted Dutton to comply with the law and treat its employees fairly. I feel that I have taken on a greater burden than any of the other Dutton employees because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. Even though I understood that this lawsuit would be a public record, I accepted that burden for the benefit of Dutton's other workers.

4. I have been actively involved in this case since before it was filed. Some of the tasks I have performed include, gathering relevant documents for use in the lawsuit, providing

1 factual information regarding the claims and Dutton's practices to my attorneys, and helping
2 identify other employees who also experienced the same issues that I did. I also made myself
3 available the entire day of mediation to answer my attorneys' questions. I estimate that I have
4 spent at least 20 total hours on these activities.

5 I declare under penalty of perjury under the laws of the state of California and the United
6 States that the foregoing is true and correct. Executed on Jan 12, 2023, in Santa
7 Clarita, California.

8 
Gerardo Sanchez (Jan 12, 2023 20:15 PST)

Gerardo Sanchez