

AEGIS LAW FIRM, PC
SAMUEL A. WONG, State Bar No. 217104
KASHIF HAQUE, State Bar No. 218672
JESSICA L. CAMPBELL, State Bar No. 280626
jcampbell@aegislawfirm.com
9811 Irvine Center Drive, Suite 100
Irvine, California 92618
Telephone: (949) 379-6250
Facsimile: (949) 379-6251

Attorneys for Plaintiffs, individually,
and on behalf of all others similarly situated.

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

FERNANDO G. HERRERA, individually and
on behalf of all others similarly situated,

Plaintiff,
vs.

ST. PAUL'S EPISCOPAL HOME, INC.; and
DOES 1 through 20, inclusive,

Defendants.

Case No.: 37-2021 -00050163-CU-OE-CTL
[Hon. Blaine K. Bowman, Dept. C-74]

DECLARATION OF PLAINTIFF
FERNANDO G. HERRERA IN SUPPORT
OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS SETTLEMENT

Hearing Date: April 4, 2025
Hearing Time: 8:30 a.m.

Action Filed: November 30, 2021

I, Fernando G. Herrera, declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration, with the help of a translator, in support of my Motion for Preliminary Approval of Class Action Settlement.

2. I worked for Defendant St. Paul's Episcopal Home, Inc. ("Defendant") as a non-exempt employee from about March 2013 to March 2021. My last position was Maintenance Supervisor in the Facilities department, which is in charge of maintenance, housekeeping, laundry, and security. As such, I witnessed a broad range of Defendant's operations during my tenure.

3. Based on my experience and knowledge of Defendant's wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other non-exempt employees of Defendant.

4. I am seeking to become a Class Representative in this case. I believe my experiences are similar to Defendant's other non-exempt employees. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other non-exempt employees that would hinder my ability to represent them. Therefore, I believe I will adequately represent Defendant's other non-exempt employees.

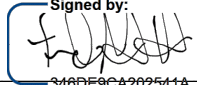
6. My interests as a named plaintiff in this litigation are not adverse to the interest of the other non-exempt employees. My interests are the same as the interests of the other non-exempt employees because we were all subject to the same policies and practices and were similarly injured by Defendant's company-wide policies and practices. I am seeking the same recovery on behalf of myself and other non-exempt employees, which is to collect unpaid wages, meal period premiums, rest period premiums, and penalties that are owed by Defendant.

7. I have always kept the best interests of the other non-exempt employees while performing my duties as the named plaintiff in this action. I have been committed throughout the course of this litigation to vigorously prosecuting this case on behalf of myself and the other non-exempt employees. I believe that I have demonstrated my ability to advocate for the interests of the

other non-exempt employees by initiating this lawsuit, providing documents to my attorneys pertaining to my employment with Defendant, keeping in regular contact with my attorneys regarding the status of the lawsuit, providing my attorneys with any information needed to continue to prosecute this action, and reviewing the settlement and its terms to make sure it was fair.

8. I will continue to actively participate in this lawsuit as necessary, and will continue to make myself available to assist in this case in the future as needed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on March 3, 2025 in California.

Signed by:

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Fernando G. Herrera