

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Tara Zabehe (SBN 314706)
Margaux Gundzik (SBN 340116)
LAWYERS for JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Albert Walker

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ALBERT WALKER, individually, and on
behalf of other members of the general
public similarly situated, and individually,
and on behalf of other aggrieved employees
under the California Private Attorney
General Act of 2004;

Plaintiff,

vs.

THE CHRYSALIS CENTER, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 22STCV22659 [*consolidated with*
Case No. 22STCV22510]

Honorable Samantha P. Jessner
Department 7

**DECLARATION OF ALBERT WALKER IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: August 21, 2025
Time: 10:00 AM

Complaint Filed: July 12, 2022

DECLARATION OF ALBERT WALKER

I, Albert Walker, 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 The Chrysalis Center ("Defendant") from approximately November 2018 to January 2022 and from July 2024 through December 2024 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure The Chrysalis Center was held accountable for not properly compensating its employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC 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 a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included looking for documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. In addition, I assisted my attorneys in preparing responses to Defendant's Request for Production of Documents, Special Interrogatories (Set One and Set Two), and Form

1 Interrogatories. I prepared and made myself available for deposition in connection with this matter
2 on January 14, 2025, and had begun preparing for the deposition until I was informed of the
3 settlement offer and notified, once I accepted it, that my deposition would no longer be needed.

4 5. Throughout this matter, 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 them
6 as quickly as possible and gave them as much information and identified as many documents as I
7 could. I spent time speaking with my attorneys about the case, identifying potential witnesses,
8 providing my attorneys with information concerning the case, and also describing policies,
9 practices, and procedures of Defendant.

10 6. As far as the settlement is concerned, I was available to review documents and
11 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
12 Settlement Agreement and discussed the questions I had regarding the potential settlement with my
13 attorneys before signing the settlement papers.

14 7. I understand that a settlement has been reached in my case and what my duties and
15 responsibilities are as a class and PAGA representative. For example, I am aware that if the
16 settlement is granted preliminary approval, the Court will certify a class for settlement purposes
17 and likely appoint me as the representative of the class and my attorneys as counsel for the class. I
18 also understand that my duties will include checking in on, monitoring, and conferring with my
19 attorneys to facilitate the notice and settlement administration process, and to provide information
20 that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate.
21 Further, if any individuals who are potential class members contact me, I will take steps to have
22 them referred to the Court-appointed settlement administrator so that these individuals may receive
23 the necessary information and notice they may be eligible to receive in connection with the
24 settlement and contemplated final approval hearing.

25 8. I believe that I have done everything that my attorneys have asked of me and have
26 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
27 members and the State of California with respect to aggrieved employees. I have volunteered to
28 represent and champion the interests of many other people with similar claims and injuries because

of the importance of the case and the necessity that all class members and aggrieved employees benefit from the lawsuit equally. I understand that as a proposed class representative, and if formally appointed as a class representative, I have and continue to represent the interests of all members of the class in litigation to recover relief for the class. As an hourly-paid non-exempt employee of Defendant who was subject to the same policies, practices, and procedures as the other members of the class, I have claims that are typical of those of the class. I consider the interests of the class just as I would consider my own interests. I understand that I may need to put the interests of the class before my own interests, although I have no reason to believe that my interests are in conflict with the interests of the class. I understand that any resolution of the lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have participated, and continue to participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that I have retained.

9. I think my efforts helped to get the result obtained in this matter, and as a potential class and PAGA representative, I respectfully request that the Court award me an enhancement award of \$10,000.00 for my efforts in pursuing and participating in this matter, as well as my broader release of claims. Taking into consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

10. I am not related to anyone associated with Lawyers *for* Justice, PC.

11. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and aggrieved employee.

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

Executed on this 28 day of May 2025, at Los Angeles, California.

Electronically Signed: 2025-05-29 00:03:24 UTC - 166.199.151.128
Nintex AssureSign® d9f50571-7ae5-4eda-954b-b2ab017376b1

Albert Walker