

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT
10/6/2025 5:15 PM
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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

VALERIA CHAVEZ and JESSE RAMIREZ,
individually, and on behalf of the State of
California and other aggrieved persons,

Plaintiffs,

vs.

PACIFIC DERMATOLOGY INSTITUTE INC., a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: CIVSB2426370

*Assigned for All Purposes To:
Hon. Stephanie Thornton-Harris, Dept. S31*

**DECLARATION OF PLAINTIFF
VALERIA CHAVEZ IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

Date: October 16, 2025

Time: 1:30 p.m.

Dept.: 7

I, Valeria Chavez, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Approval of PAGA Settlement.

2. I worked as a non-exempt employee for the Defendant Pacific Dermatology, Inc. (“Defendant” or “Pacific Dermatology”) in Yucca Valley, California, from approximately February 2023, through November 2023. I was paid on an hourly basis and worked for Defendant as a back office medical assistant and certified dermatology technician.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

3. When I decided to become involved in this lawsuit as a private attorney general for the State of California, I understood that I was not only seeking civil penalties on behalf of myself and the State of California, but also for other aggrieved employees who worked for Pacific Dermatology.

4. I was also made aware that being a private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a private attorney general, I might be responsible for some or all of Pacific Dermatology’s legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

5. I understood that there were risks involved in representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

6. As the named plaintiff, I am the face of the litigation. Additionally, a settlement letter will be mailed to over 168 current and former employees of Pacific Dermatology, Inc. The settlement letter informs all of these employees that I filed a representative action against Pacific Dermatology,

Inc. Exposing myself to this kind of publicity creates a risk for my future career prospects, since current and former employees of Pacific Dermatology, Inc. may move to different companies within the industry or may know people at other companies within the industry who may not want to hire someone who sued an employer.

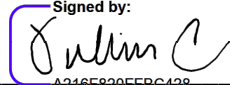
Amount of Time and Effort Spent and Duration of the Litigation

7. I have spent a substantial amount of time and effort on this litigation. My work on this case has included, among other things, gathering and providing my payroll records, discussing potential witnesses, reviewing discovery information and data, and participating in settlement discussions. After mediation, I remained actively involved by reviewing the settlement papers and regularly contacted my counsel for updates. I estimate that since I retained my counsel, I have spent approximately 30 hours on the activities described above.

Personal Benefit Received as a Result of the Litigation

8. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, I have signed a general release of Pacific Dermatology, Inc. The other employees are only releasing their claim for civil penalties under PAGA as asserted in the lawsuit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 10/6/2025, at Twenty-Nine Palms, California.

Signed by:

 A216F820FFBC428...
 Valeria Chavez