

AEGIS LAW FIRM, PC

KASHIF HAQUE, State Bar No. 218672

SAMUEL A. WONG, State Bar No. 217104

JESSICA L. CAMPBELL, State Bar No. 280626

KRISTY R. CONNOLLY, State Bar No. 328477

9811 Irvine Center Drive, Suite 100

Irvine, California 92618

Telephone: (949) 379-6250

Facsimile: (949) 379-6251

Email: kconnolly@aegislawfirm.com

Attorneys for Plaintiff Patricia Cruz, individually,
and on behalf of all others similarly situated.

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

PATRICIA CRUZ, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

WELLNEST EMOTIONAL HEALTH &
WELLNESS; and DOES 1 through 20,
inclusive,

Defendants.

Case No. 22STCV23671

*Assigned for All Purposes to:
Judge Timothy Dillon
Dept. 15*

**DECLARATION OF PATRICIA CRUZ
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

I, Patricia Cruz, 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 in support of my Motion for Preliminary Approval of Class Action Settlement.

2. I worked for Defendant Wellnest Emotional Health & Wellness (“Defendant”) as a non-exempt employee in the position of Interpreter and Translator from about February 2018 to April 2020.

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

1 regarding the status of the lawsuit, providing my attorneys with any information needed to continue
2 to prosecute this action, and reviewing the settlement and its terms to make sure it was fair.

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

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6 I declare under penalty of perjury under the laws of the State of California that the foregoing
7 is true and correct and that this declaration was executed on June 2, 2025 in California.

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