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

JOSE VASQUEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SANTA CLARITA VALLEY COMMITTEE
ON AGING CORPORATION, dba SCV
SENIOR CENTER, a California nonprofit
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 25STCV06096

*[Assigned for all purposes to the Hon. Laura A.
Seigle, Dept. 17]*

**DECLARATION OF PLAINTIFF JOSE
VASQUEZ IN SUPPORT OF APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: August 24, 2026
Time: 9:00 a.m.
Dept.: 17

Action Filed: March 4, 2025
Trial Date: None Set

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I, JOSE VASQUEZ, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed class action and PAGA 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 am a current employee of Santa Clarita Valley Committee on Again Corp, dba SCV Senior Center (“Defendant”). I have worked for Defendant since approximately November 2021 in the non-exempt position of “Home Delivered Meals Driver/Packer” based out of Defendant’s Lancaster, California senior center location. Throughout my employment with Defendant, my duties have included packing and serving meals, loading delivery trucks with meals, driving to individual homes to deliver these meals, and performing wellness checks.

3. During my employment, Defendant has required me to perform my work duties while clocked out for purported meal periods. Specifically, due to work demands including delivery schedules that needed to be adhered to, Defendant required me to clock out prior to completing five hours of work so that my timekeeping records appeared to reflect a meal period, despite no such meal period actually being provided. Instead, most of my meal periods have started after I completed five hours of work, were shorter than 30-minutes in length, or were missed altogether. Further, because of the work demands imposed by Defendant that must be completed in a specified timeframe, for example, meal deliveries and wellness checks for the elderly, I am prevented from taking 10-minute rest periods, even when my shifts exceed 3.5 hours in length. Moreover, Defendant requires me to carry and be responsive to my cellular phone at all times while on duty, including during meal periods and rest periods. I am also required to use the “Zippy” cell phone application for timekeeping purposes. Even though Defendant requires me to use my personal cell phone to communicate with my supervisors to make arrangements for delivery cancellations and changes and for timekeeping purposes, Defendant does not reimburse any portion of my cellular phone bill.

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4. When I first filed my lawsuit, I understood that it had the chance to benefit Defendant's other workers by helping them recover money and penalties they were owed. I felt that Defendant was not following the law, and I wanted Defendant 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 settlement class members because I have been actively involved in the litigation since it began, and because it is my name that is attached to the lawsuit. I also assumed the risks that Defendant might retaliate against me by filing this lawsuit while I was still a current employee. Although I was aware that I would be filing a public lawsuit, I chose to move forward with the case anyway. Through my efforts, Defendant has agreed to a settlement that will benefit current and former employees of Defendant, and I believe that I should be compensated for carrying the burden of this litigation for the benefit of the other employees.

5. I have been actively involved in this case since before it was even filed. Among other things, I searched for relevant documents for use in the lawsuit, provided factual information and relevant documents to my attorneys, had many phone calls with my attorneys to discuss the claims in the lawsuit and Defendant's practices, discussed the status of the case and general case strategy with my attorneys on multiple occasions, provided valuable input and documents to assist my attorneys in preparing for mediation, made myself available throughout the mediation that lead to this settlement, reviewed and provided input regarding the settlement in this case, and otherwise assisted my attorneys in moving this case towards resolution. I estimate that I have spent approximately 18-20 hours in total on these activities.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on Feb 5, 2026, at Lancaster, California.

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Jose Vasquez (Feb 5, 2026 14:20:50 PST)

Jose Vasquez