

Kevin Mahoney (SBN: 235367)
kmahoney@mahoney-law.net
Katherine J. Odenbreit (SBN: 184619)
kodenbreit@mahoney-law.net
MAHONEY LAW GROUP, APC
249 E. Ocean Boulevard, Suite 814
Long Beach, CA 90802
Telephone No.: (562) 590-5550
Facsimile No.: (562) 590-8400

Attorneys for Plaintiff JULIO ANDRES CRUZ, as an individual and on behalf of the State of California and all Aggrieved Employees [**Additional Counsel Below**]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA**

JULIO ANDRES CRUZ and ALBERTO
C. CORTEZ, an individual, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

CAMBRIDGE REAL ESTATE
SERVICES, INC. DBA CAMBRIDGE
RES, INC., and DOES 1-50, inclusive,

Defendants.

Case No.: C22-02342

Assigned for all purposes to the
Hon. Benjamin T. Reyes, II, Dept. 16

**DECLARATION OF REPRESENTATIVE
PLAINTIFF JULIO ANDRES CRUZ IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL SETTLEMENT, AWARD OF
ATTORNEYS' FEES, COSTS AND PAGA
REPRESENTATIVE SERVICE AWARD**

DATE: August 12, 2026

TIME: 9:00 a.m.

DEPT.: 16

1 **DAVID YEREMIAN & ASSOCIATES, INC.**

2 David Yeremian (SBN 226337)

3 david@yeremianlaw.com

4 250 N. Madison Ave.

5 Pasadena, CA 91101

6 Telephone: (818) 962-6465

7 Facsimile: (818) 962-6469

8 **D.LAW, INC.**

9 Emil Davtyan (SBN 299363)

10 Emil@d.law

11 Alvin B. Lindsay (SBN 220236)

12 a.lindsay@d.law

13 250 N. Madison Ave.

14 Pasadena, CA 91101

15 Telephone: (818) 962-6465

16 Facsimile: (818) 962-6469

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18 Attorneys for Plaintiff ALBERTO C. CORTEZ,
19 on behalf of himself and all others similarly aggrieved employees
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1 **DECLARATION OF JULIO ANDRES CRUZ**

2 I, Julio Andres Cruz, declare:

3 1. I am an adult over the age of eighteen (18) and I am the representative named
4 Plaintiff in the above referenced action. The contents of this declaration are based on my
5 personal knowledge and I would and could competently testify thereto if called to testify. I
6 make this declaration in support of the Motion for Approval of the Private Attorneys General
7 Act Settlement, Award of Attorneys' Fees, Costs and PAGA Representative Service Award.

8 2. I was employed by Cambridge Real Estate Services, Inc. from approximately
9 January 23, 2019 until about August 25, 2021. I worked as a non-exempt maintenance
10 technician at an apartment complex managed by Defendant in Oakley, California.

11 3. I believe that during my employment Defendant did not pay me and other non-
12 exempt employees all of our wages. I was scheduled to work 8 hours per day performing
13 maintenance and repairs to the apartment complex. I was routinely required to respond to calls
14 from Defendant after work hours to address maintenance issues or tenant requests and to
15 respond immediately when called. During these on-call hours, I was not permitted to engage in
16 personal activities and had to remain within a 30-minute drive of the property. I was not
17 permitted to record and was not paid for time I was required to be on-call and was only
18 permitted to record the time I spent responding to a call. There were also times I was required to
19 drive to other properties owned and/or managed by Defendant to perform work or retrieve or
20 deliver materials. I was not paid for time spent traveling to other work locations.

21 4. While working for Defendant I was not provided with duty-free meal periods. I
22 was required to record a 1-hour meal period, even though my employer knew I continued to
23 work during that time. Further, if I was on a meal break, I was required to answer calls from
24 Defendant or tenants and to respond so I was never "off-duty". I was not paid by Defendant for
25 time I worked through a meal period and I was not paid an additional hour of pay for any meal
26 period that was cut short, not taken or not taken within the first 5 hours of my shift. Likewise, I
27 was never permitted to take off-duty rest breaks.

28 5. As a result of not being paid for all time I worked, I believe my pay stubs were

1 inaccurate and I was not paid all wages I was due when my employment with Defendant ended
2 on or around August 25, 2021.

3 6. I was required by Defendant to wear a uniform that consisted of a logo shirt and
4 steel-toed boots which were not practical to wear outside of work. Defendant provided the shirts
5 but I was required to purchase the boots for which I was not reimbursed. I was reimbursed for
6 costs associated with laundering my uniform. I was required to wash my uniform daily and
7 separate from my normal laundry due to excessive soiling, chemicals and grease due to my job
8 duties. I was also required to use my personal vehicle to drive to different work locations for
9 which I was not reimbursed.

10 7. I decided to file a lawsuit against Defendant. I met with my attorneys and
11 considered my options. I decided to bring the lawsuit as a designated representative of the State
12 of California for civil penalties for myself and other non-exempt employees who experienced
13 the same law violations and who were subject to the same policies and practices of Defendant. I
14 also understood that 75% of any civil penalties recovered in the case would be paid to the State
15 and myself and all of the aggrieved employees would receive a portion of 25% of the civil
16 penalties recovered.

17 8. I spent a significant amount of time searching for documents in my possession,
18 discussing with my attorneys this matter, explaining company policies and practices, reviewing
19 documents, answering questions and assisting with the investigation of the claims. Throughout
20 the case, I have made myself available to my attorneys at their request, stayed in consistent
21 contact with my attorneys regarding the status of the case, discussed the mediation and
22 settlement with my attorneys and participated in many phone calls and meetings. I estimate that
23 I spent over seventy (70) hours actively participating in the lawsuit.

24 9. I am seeking a service award of five thousand dollars (\$5,000.00) for my
25 assistance in prosecuting the case for the State and other employees. I took a huge risk by
26 coming forward with this action and I believe the settlement is fair and reasonable. By
27 becoming a PAGA representative I risked potential retaliation and negative job references from
28 Defendant. Also, I am advised that the State keeps a public database where anyone can look up

1 my name and learn I brought this action. I understood the risks future employers could find out I
2 brought this case and I understood the other risks when I decided to bring this case. I believe the
3 \$5,000.00 is reasonable for a service award. I understand that the Court must approve this award
4 and that it is not guaranteed.

5 10. In fact, one of my subsequent employers learned I had brought this lawsuit
6 against a former employer which I believe was a motivating factor in terminating my
7 employment with them.

8 11. I do not have any interests that are in conflict with the other employees who will
9 receive payment from this settlement.

10 12. I have reviewed with my attorneys the Settlement Agreement we have negotiated
11 with Defendant and I have agreed to its terms as a representative on behalf of the State of
12 California. I agreed to the settlement because I believe it is fair.

13 13. I did not type this declaration, but I did review it with my attorneys and
14 everything is true and accurate.

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

17 Dated this 25 day of June 2026, at Sacramento, California.

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19 *Julio Andres Cruz*

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21 Julio Andres Cruz
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PROOF OF SERVICE
Code of Civ. Proc. § 1013a, subd. (3)

STATE OF CALIFORNIA, COUNTY OF CONTRA COSTA

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 249 East Ocean Boulevard, Suite 814, Long Beach, California, 90802.

On **July 21, 2026**, I served [X] true copies [] originals of the following document(s):
DECLARATION OF REPRESENTATIVE PLAINTIFF JULIO ANDRES CRUZ IN SUPPORT OF PLAINTIFFS' MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL SETTLEMENT, AWARD OF ATTORNEYS' FEES, COSTS AND PAGA REPRESENTATIVE SERVICE AWARD. I served the document(s) on the person(s) below as follows:

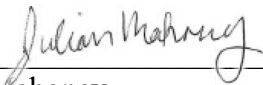
Derek S. Sachs, Esq. Elaine McCormick, Esq. O'HAGAN MEYER LLP One Embarcadero Center, Suite 2100 San Francisco, CA 94111	Attorneys for Defendant CAMBRIDGE REAL ESTATE SERVICES, INC. Telephone: (916) 564-5400 Facsimile: (916) 564-5444 Email: dsachs@ohaganmeyer.com emccormick@ohaganmeyer.com kjanus@ohaganmeyer.com
David Yeremian, Esq. DAVID YEREMIAN & ASSOCIATES, INC. 250 N. Madison Ave. Pasadena, CA 91101	Co-Counsel for Plaintiffs JULIO ANDRES CRUZ and ALBERTO C. CORTEZ Telephone: (818) 962-6465 Facsimile: (818) 962-6469 Email: david@yeremianlaw.com
Emil Davtyan, Esq. Alvin B. Lindsay, Esq. D.LAW, INC. 250 N. Madison Ave. Pasadena, CA 91101	Co-Counsel for Plaintiffs JULIO ANDRES CRUZ and ALBERTO C. CORTEZ Telephone: (818) 962-6465 Facsimile: (818) 962-6469 Email: Emil@d.law a.lindsay@d.law

The document(s) were served by the following means:

☒ **By e-mail:** Based upon court order or an agreement of the parties to accept service by e-mail, I caused the document(s) to be sent to the persons at the electronic service addresses listed above from the email address julian.mahoney@mahoney-law.net. Within a reasonable time after the transmission, no error, electronic message or any other indication that the transmission was unsuccessful was received.

☒ **(State):** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **July 21, 2026**, at Long Beach, California.



Julian Mahoney