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[Additional Counsel Listed On Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF TULARE

ENVY AZEVEDO, an individual, on behalf
 of herself and others similarly situated,

PLAINTIFF,

v.

TULARE NURSING & REHABILITATION
 HOSPITAL, INC.; and DOES 1 thru 50,
 inclusive,

DEFENDANTS.

Case No. VCU293325

[Case Assigned for All Purposes to Hon.
 David C. Mathias in Dept. 1]

**DECLARATION OF ENVY AZEVEDO
 IN SUPPORT OF PLAINTIFF'S
 MOTION FOR APPROVAL OF
 REPRESENTATIVE ACTION
 SETTLEMENT**

Date: November 21, 2024
 Time: 8:30 a.m.
 Dept.: 1

Complaint Filed: September 14, 2022
 Trial Date: None Set

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DECLARATION OF ENVY AZEVEDO

I, ENVY AZEVEDO, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendants TULARE NURSING & REHABILITATION HOSPITAL, INC. and TULARE HEALTHCARE & WELLNESS CENTER, LP (collectively, "Defendants").

3. I brought this lawsuit, on behalf of myself and all other aggrieved employees, against Defendants because I believe that Defendants failed to pay for all hours worked, including minimum, straight time, and overtime wages; failed to provide meal periods; failed to authorize and permit rest periods; failed to pay all wages twice per month; failed to maintain accurate records of hours worked and meal periods; failed to timely pay final wages; failed to issue accurate wage statements; and failed to reimburse business related expenses to me and other employees.

4. This lawsuit against Defendants started as a Class Action lawsuit, but is now a PAGA lawsuit as a result of an existing arbitration agreement.

5. I have spent significant time throughout this lawsuit working with PAGA Counsel. Before filing this action initially on September 14, 2022, I researched and identified PAGA Counsel that I believed could best represent the interests of the Aggrieved Employees.

6. I understand that I am representing other employees and I believe that I am able to represent them well.

7. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendants, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys' various communications regarding this matter, making myself available by phone for a full-day mediation on May 6, 2024; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of

the Aggrieved Employees.

8. Throughout the entirety of this litigation, I have maintained regular contact with my attorneys and assisted in any way possible by providing information and making myself available as needed.

9. I have worked to actively represent the other Aggrieved Employees and their interests.

10. I have always kept the Aggrieved Employees' interests at heart in this litigation.

11. I was aware that by helping to initiate this lawsuit, my name would become known and it was possible that my involvement in this matter could make it more difficult for me to obtain employment in this field. Regardless, I believed it was important to proceed with this matter on my behalf and on behalf of all others who were subject to the same problems during their employment with Defendants.

12. I am prepared to continue assisting with this litigation and am committed to achieving the best possible results for the Aggrieved Employees.

13. I believe that the representative action settlement obtained on behalf of the Aggrieved Employees is fair and reasonable in light of the issues involved in this case. As mentioned above, I reviewed and discussed the Agreement with my attorneys and asked them questions about it to ensure that I understood its terms and what it would mean for all of the Aggrieved Employees.

14. I believe that I have fairly represented the absent Aggrieved Employees and request that the Court finally approve this settlement and confirm me as the named Plaintiff.

15. I am not aware of any conflicts of interest that prevent me from being confirmed as the named Plaintiff in this action. I am not related in any way to my attorneys or to any other member of the firm that is representing me. I have no business dealings or other involvement beyond this lawsuit and this representation. I have not been promised any money or inducement to serve as the named Plaintiff in this action.

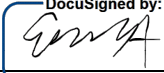
16. It is my opinion that the settlement agreement provides for a fair and adequate enhancement for me as the named Plaintiff, in the amount of \$7,500.00. I believe that this is fair

1 and reasonable in light of all of the work that I have performed in my role as the named Plaintiff.
2 As the named Plaintiff, I have actively participated in all stages of the litigation, as detailed above,
3 and have always maintained the best interests of the Aggrieved Employees while performing my
4 named Plaintiff duties.

5 17. It is also my opinion that the Enhancement payment is fair, reasonable, and
6 adequate because, in addition to the many hours spent participating in the prosecution of this case,
7 I accepted the potential risk of being liable for Defendants' attorneys' fees and costs if we were
8 unsuccessful in this action. Likewise, I risk the potential stigma of being a named Plaintiff in a
9 representative action labor dispute, which may affect my future employability.

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

12 Executed this 30 day of August, 2024 at Tulare
13 California. (City)

14 DocuSigned by:
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16 ENVY AZEVEDO
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(PROOF OF SERVICE)

[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On October 29, 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF ENVY AZEVEDO IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

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[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 29, 2024, at Encino, California.



Michelle Tanzer