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13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 ERIC HERRERA, individually, and on
16 behalf of all others similarly situated,

17 *Plaintiff,*

18 v.
19

20 CORECIVIC OF TENNESSEE, LLC, a
21 Tennessee limited liability company;
22 and DOES 1 through 50, inclusive

23 *Defendants.*

Case No.: 3:25-cv-2298-GPC-DEB

*Assigned to District Judge Hon. Gonzalo
P. Curiel*

**DECLARATION OF PLAINTIFF
ERIC HERRERA IN SUPPORT OF
JOINT MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

APPROVAL HEARING

Date: July 31, 2026

Time: 1:30 p.m.

Room: 12A

Complaint Filed: May 30, 2025

Removal Filed: July 11, 2025

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DECLARATION OF ERIC HERRERA

I, Eric Herrera, 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.

2. I am the named Plaintiff in this action and submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and Class Representative Service Payments. Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request of a \$10,000.00 service payment as a Class Representative.

3. I worked for Defendant from approximately August 2019 to approximately April 2025. At all times, Defendant paid me as an hourly wage and classified me as eligible for overtime pay.

4. I filed this lawsuit in May 2025 because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks. I worked full time for Defendant approximately 8 hours a day, but sometimes more. While working for Defendant, my coworkers and I were asked to work long hours because of the amount of work, sometimes missing taking meal and rest breaks. I also observed my coworkers working long hours and missing breaks.

5. By originating this lawsuit as a Class Representative, I hoped that I might be able to change Defendant's policies to better protect the working conditions of my co-workers. I also understood that it was my duty as a Class Representative to represent the best interests of the class, know about the lawsuit, help my attorneys, and keep updated on the case.

6. I have invested a lot of personal time and energy while this lawsuit has been pending. I had conversations with my attorneys on several occasions. I take it very seriously to discuss with my attorneys because I wanted to do everything I can to assist my attorneys in prosecuting this case. Because I work on the ground, I was able to describe the working environment working for Defendant. I described the long

1 hours and sometimes missing meal and rest breaks to my attorneys and answered their
2 questions regarding what the hours and meal and rest breaks were like. I understand
3 that these conversations and explanations helped them in prosecuting the lawsuit and
4 assisted them in meaningful ways in forming discovery requests.

5 7. Throughout this case, I spent a lot of time on the phone with my attorneys
6 to get updates about the case and provide them with information. Since I first got
7 involved in this case, I had numerous phone calls with my attorneys, with some of
8 these phone calls lasting approximately 45 to 60 minutes. Moreover, I have exchanged
9 text messages with my attorneys to discuss the case and ask for updates.

10 8. I also kept my paystubs and paychecks, which I provided to my attorneys.
11 Based on these records, my attorneys and I were able to identify instances when it
12 appeared that I was not paid overtime correctly.

13 9. I talked with my attorneys before mediation to discuss my opinions about
14 the case and to obtain information regarding the settlement prospect. I also kept in
15 regular contact with my attorneys during the mediation process and I discussed with
16 my attorneys the terms of the settlement.

17 10. I also reviewed documents that were filed and that I signed, including the
18 settlement agreement, to remain informed about the case and to fully understand the
19 terms of the settlement.

20 11. I believe the settlement is a good settlement and I would recommend that
21 the Court approve it because I believe that this settlement is fair, adequate, and
22 reasonable. I am glad that I had the opportunity to represent the class in this lawsuit
23 and that I was able to recover money through a settlement for the class.

24 12. I have observed my attorneys' work throughout this case. They have been
25 thorough, diligent, prompt, courteous, and professional, and I believe they are fully
26 entitled to the award of fees that they have requested for their hard work.

27 13. I did not make the decision to file a class action lightly. I am mindful that
28 prospective employers might find out that I sued my former employer, and this could

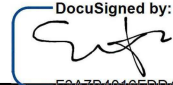
1 hurt my employability in the future. In addition, I was concerned by the attention a
2 publicly filed lawsuit, and especially a class action, would attract. My name would be
3 associated with a lawsuit that I filed against my former employer. I was aware that it
4 is possible to perform background checks of publicly filed documents on the Internet,
5 sometimes with nothing more than a simple Google search. Nevertheless, I felt that
6 important rights were at stake that hurt everyone, and something ought to be done
7 about it.

8 14. Standing up for myself and the rights of others was not an easy decision,
9 and I am relieved that this is coming to an end. I estimate that I spent at least 45 to 50
10 hours on this case. I am receiving no compensation additional to that provided for in
11 the settlement.

12 15. I respectfully request that the Court award me a \$10,000.00 service
13 payment. Based on my involvement in this case and the benefits provided to my
14 current and former co-workers, I can say I helped stand up for the other workers who
15 may have been too afraid to risk the stigma of suing an employer. I was not afraid to
16 take that risk because I strongly care about helping out my current and former co-
17 workers.

18 I declare under penalty of perjury under the laws of the State of California and
19 the United States that the foregoing is true and correct.

20 Executed on 4/28/2026, in Chula Vista, California.

21 DocuSigned by:
22 

23 Eric Herrera
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