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Attorneys for Plaintiff ARTURO CUADRAS,
 on behalf of the State of California and all other
 similarly situated aggrieved employees

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

ARTURO CUADRAS, on behalf of himself)
 and all others similarly situated,)

Plaintiffs,)

v.)

LOS ANGELES REHABILITATION &)
 WELLNESS CENTRE, LP d/b/a "Country)
 Villa Rehabilitation Center," a California)
 limited partnership; and DOES 1 to 10,)
 inclusive,)

Defendants.)

PAGA-ONLY ACTION

Case No. 23STCV09959

**DECLARATION OF PAGA
 REPRESENTATIVE ARTURO
 CUADRAS IN SUPPORT OF HIS
 MOTION FOR APPROVAL OF PAGA
 SETTLEMENT**

Honorable Michael Small
 Department 57

Hearing: December 7, 2023
 Time: 8:30 a.m.
 Reservation No.: 187914277887

Action filed: May 4, 2023
 Trial date: None Set

DECLARATION OF ARTURO CUADRAS

I, Arturo Cuadras, declare:

1. I am over the age of eighteen and the PAGA Representative Plaintiff in this action. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. I am familiar with the work involved in prosecuting the PAGA Action against my former employer. I have had numerous in-person and telephonic meetings with my attorneys. I

1 am familiar with the client meetings, discovery conducted, settlement meetings, and have
2 participated in all stages of the litigation.

3 3. I have and will continue to adequately represent the interests of all members of
4 the proposed classes I seek to represent. My claims are typical of all other Aggrieved Employees
5 and involve the same common issues. I have no interests which are inconsistent with any of these
6 Aggrieved Employees.

7 4. I have always considered the interests of the other Aggrieved Employees just as I
8 have my own interests and understand that I have to put the interests of the other Aggrieved
9 Employees before my own. I have participated, and will continue to participate, in this lawsuit up
10 to and through the time of judgment. I have volunteered to represent the other Aggrieved
11 Employees because of the importance of the case and so that other Aggrieved Employees can
12 benefit from the enforcement of the law and the savings of time, money, and effort that should
13 result in the settlement of this case on a class basis.

14 5. I am glad that I had the opportunity to represent the other Aggrieved Employees
15 in this lawsuit and that I was able to recover money for the State and the Aggrieved Employees. I
16 believe the settlement is a good settlement, and I would recommend that the Court approve it
17 because I believe that this settlement is fair, adequate, and reasonable.

18 6. I understand that the settlement agreement provides for an Individual Settlement
19 and Service Award to me in the amount of \$15,000. I believe this amount is fair and reasonable.
20 This amount takes into consideration the time, effort, risks, stress, and sacrifice of signing a
21 general release of all claims, as well as the benefit provided to the State and all Aggrieved
22 Employees as a result of my involvement in this litigation.

23 7. In total, I estimate that I spent more than 30 hours on this case. Both before and
24 after filing the lawsuit, I engaged in lengthy conversations with my attorneys about all aspects of
25 this case and my job. I spent time investigating these claims and all work for this litigation,
26 meeting with my attorneys, reviewing documents, preparing for the mediation and attending the
27 full-day mediation, and following-up with my attorneys. I was always prompt and responsive to
28

1 my attorneys' inquiries. I believe I have been diligent and acted above and beyond that which is
2 expected of a PAGA Representative throughout all stages of the litigation.

3 8. Furthermore, it is my opinion that the amount requested is fair and reasonable
4 because I signed a general release, which I understand is broader than the release that will bind
5 other Aggrieved Employees, so I am not only giving up my PAGA claims, but I am also giving
6 up all claims I had against my former employer. Since I have signed a general release for any
7 and all claims related to my employment with Defendant, I can't pursue any other claims against
8 Defendant. My value of my individual claims that I am releasing easily exceed the amount of the
9 Individual Settlement and Service Award the parties agreed to in this case.

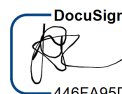
10 9. This litigation has also resulted in a valuable benefit to the State and other
11 Aggrieved Employees who will participate in the monetary payout of this Settlement because of
12 my involvement.

13 10. Based on the time, risk, stress, sacrifice of signing of a general release, and the
14 great outcome of this case, I believe that the requested enhancement for me is fair and
15 reasonable. As such, I respectfully request that the Court award the requested Individual
16 Settlement of \$15,000.

17 11. I have observed my attorneys' work throughout this case. They have been
18 thorough, diligent, prompt, courteous, and professional, and I believe they are fully entitled to
19 the award of fees that they have requested for their hard work. I agree with their split of
20 attorney's fees.

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

23 Executed on November 10, 2023, at Whittier, California.

24
25  DocuSigned by:
446FA95DF42740C

26 Arturo Cuadras