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9 Attorneys for Plaintiff ROCIO JUAREZ
10 As an individual and on behalf of all others similarly situated

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES**

13 ROCIO JUAREZ, as an individual on
14 behalf of herself and on behalf of all others
15 similarly situated,

16 Plaintiff,

17 v.

18 EXCEL RESIDENTIAL SERVICES,
19 INC., a California corporation; and DOES
20 1-100, inclusive,

21 Defendants.

Case No.: 23STCV05997

Assigned for all Purposes to:
Hon. Carolyn B. Kuhl
Dept. SSC-12

DECLARATION OF ROCIO JUAREZ

Date: March 13, 2025
Time: 10:30 am
Dept.: SSC-12

1 I, Rocio Juarez, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.

5 2. I was employed as an hourly-paid non-exempt Porter/Cleaner for Excel from
6 approximately May 2017 to the present, although I've been out on medical leave. My job duties
7 required that she clean two separate apartment buildings daily and I would spend approximately
8 half of her work day at one location before driving to the next complex in my own car to complete
9 my daily cleaning duties. Even though I drove my own car while working I was not reimbursed
10 for gas or mileage for the approximate 15-minute drive between the two properties. I also was on
11 my "lunch break" when I made the drive and don't think I got a full lunch break because I spent
12 some of the time driving, and I wasn't paid for that time either.

13 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
14 employee of Defendant, especially with regard to me not receiving all of the pay I believe I
15 earned, and for not getting all of my breaks or any reimbursement for using my own car.

16 4. It is my understanding this lawsuit could not have been prosecuted or settled on
17 behalf of the Class unless I or some other current or former employee decided to serve as a named
18 plaintiff. In deciding to serve as a named plaintiff in this case, I understood that my name could be
19 publicly attached to this lawsuit and that my work experiences to some extent would be set forth in
20 a public court file. I recognized I would need to devote a certain amount of time that I could have
21 spent otherwise. I also recognized my bringing the lawsuit carried some degree of risk for
22 defendant's legal costs among other things. Despite this, I decided to serve as the named plaintiff
23 without any promise of recovery or compensation.

24 5. I am familiar with the work involved in prosecuting this case. I have participated in
25 meetings, phone calls, and other communications with my lawyers regarding this case. I am
26 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
27 events in this case, including the investigation performed by my lawyers, the mediation with
28 Defendant that resulted in this settlement, and the preparation of settlement papers and the need to

1 obtain court approval of the proposed settlement. I participated in the litigation and provided my
2 lawyers with information and documents regarding my employment with Defendant.

3 6. I believe that the proposed settlement obtained on behalf of the other employees is
4 excellent in view of the issues and risks involved with the case.

5 7. I believe I have fulfilled my duties as the named plaintiff and class representative,
6 which required a significant amount of time and effort during the course of this case. These efforts
7 required dedicating numerous hours to lawsuit activities including, but not limited to: (a)
8 communicating with my attorneys to stay informed of ongoing developments in the case and to
9 discuss the proposed settlement ultimately negotiated; (b) searching for and providing documents
10 and other materials relating to my work experience; (c) responding to requests for information
11 relating to my work experience; and (d) reviewing filings and key documents including drafts of
12 the complaint and the settlement agreement. These tasks required my dedication of at least 20
13 hours of my time, which time I honestly could have spent on family, personal time, or work. My
14 understanding is that future tasks may require several more hours of my time. Further, at all times
15 I was ready, willing and able to testify at deposition and/or trial. I believe I have been diligent and
16 that I have acted above and beyond that of which is expected of a named plaintiff and proposed
17 class representative to date and will continue to do so.

18 8. It is my opinion that \$2,500.00 is a fair and adequate award for my service as the
19 named plaintiff and class Representative, and in addition to my separate individual settlement
20 under which I am agreeing to resign my employment with Excel as well as release all claims
21 against the company. I believe that amount is fair and reasonable in view of the work I have and
22 will continue to perform on behalf of the Class. I believe that my role in this lawsuit has resulted
23 in a valuable benefit to the other employees, and I accepted the potential risk of being liable for
24 the opposing parties' costs if we were unsuccessful in this lawsuit. I believed in this case, so I was
25 willing to be the named plaintiff to risk this and pursue this lawsuit. I also accepted the risk that
26 news of this lawsuit could also potentially impact my ability to secure other work.

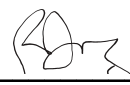
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9. Based on the time, service, risk, stress, potential stigma, loss of benefits and excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed on 12 / 16 / 2024, at Los Angeles, California.



Rocio Juarez