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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

JUAN CARLOS BAUTISTA and JAIME
CERVANTES, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

SERVICEFIRST RESTORATION, INC., a
California Corporation; and DOES 1 through
20, inclusive;

Defendants.

Case No.: CIVSB2302978

*[Assigned to Hon. Joseph Ortiz, Dept S17, for
all purposes]*

**DECLARATION OF PLAINTIFF JAIME
CERVANTES**

I, Jaime Cervantes, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for final approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. During my time working with ServiceFirst, there were issues with how I was paid and with the fact I was treated as a contractor instead of employee. For that reason, I discussed these issues with another worker at ServiceFirst and ultimately contacted my attorneys to bring claims against ServiceFirst.

1 3. When bringing this case, I understood I had two options: (1) I could bring my
2 individual case and claims and attempt to maximize my individual recovery, or (2) I could bring
3 these claims on a class action basis, trying to help all of the employees that had to deal with the
4 same issues as me. And, if I decided to bring the case as a class action, I understood that I would
5 have to put all of the other workers' interests ahead of my own. This decision was very difficult
6 because I wanted to maximize my individual recovery, but I also wanted to help everyone else
7 that was wronged by the company. In the end, I decided that – despite the risks, such as possibly
8 being labeled a whistleblower – it was important to bring this class action to hold the company
9 accountable for how they treated the workers.

10 4. I respectfully request that the Court approve the agreed-upon service award for
11 the following reasons.

12 5. First, bringing this class action made me take on significant risks and lots of stress
13 without any guarantee of success. For example, filing this lawsuit and being a whistle blower
14 was stressful on a day-to-day basis as I have constantly worried about the risk that this case
15 could impact my ability to find future jobs. And this stress/risk lasted for the entire case, and I'm
16 still worried it may make it hard to find a job in the future.

17 6. Second, I request that the Court approve the agreed-upon service award because I
18 agreed to set aside my personal interests and to put the interests of the class ahead of my own. In
19 doing so, and by successfully bringing this case as a class action, I helped to obtain a highly
20 beneficial settlement for the class members.

21 7. Third, I have devoted a substantial amount of time to work on this case and to
22 help all of the other workers obtain this settlement. To date, I estimate that I have spent well
23 over 50 hours on tasks related to this case, as I have been an active participant in this litigation
24 and have assisted my attorneys in numerous ways, including helping to explain and discuss the
25 company's practices and their general practices and procedures, locating and analyzing company
26 documents, and communicating with other individuals regarding the claims. These efforts
27 occurred through numerous telephone conferences, letters, emails, and text communications. I
28 also assisted in preparation for mediation and helped obtain a positive result for the class.

8. Fourth, I also request that the Court grant the service award because bringing this case came with serious financial risk. If I lost the case, I would be required to pay the company's costs and there was a chance they could try to make me pay their attorneys' fees as well.

9. Therefore, I respectfully request that the Court award the full requested service award since that amount is justified based on the facts above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 06/10/2025, at Orange, California.

By: Jaime Cervantes (Jun 10, 2025 09:26 PDT)
Jaime Cervantes