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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 JUAN
CARLOS BAUTISTA**

I, Juan Carlos Bautista, 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. When I worked with ServiceFirst, I thought that there were issues with how I was classified (as a contractor instead of employee) and with my pay. Because of these issues, I started researching California law and contacted attorneys regarding how I was treated.

1 3. I then contacted my attorneys and understood I had two options: (1) I could bring
2 a class action to help all of the employees, but I would have to put their interests ahead of my
3 own, or (2) I could bring my individual case and claims and attempt to maximize my individual
4 recovery. This decision was very difficult because I wanted to maximize my individual recovery,
5 but I also wanted to help everyone else that was wronged by the company. And, if I brought a
6 class action, I was worried that I might get labeled as a whistleblower, which might make it hard
7 to find a job in the future. In the end, I decided that – despite the risks – it was important to
8 bring this class action to hold the company accountable for how they treated the workers.

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

11 5. First, I have spent substantial time working on this case – at least 50 hours
12 engaged in activities to benefit the class. I have been an active participant in this litigation and
13 have assisted my attorneys in numerous ways, including helping to explain and discuss the
14 company’s practices and their general practices and procedures, locating and analyzing company
15 documents, and communicating with other class members. These efforts occurred through
16 numerous telephone conferences, letters, emails, and text communications. I also assisted in
17 preparation for mediation and helped obtain a positive result for the class.

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

22 7. Third, by bringing this class action, I undertook significant risks and stresses at a
23 high emotional cost without any guarantee of success. For example, filing this lawsuit and being
24 a whistleblower was stressful on a day-to-day basis as I have constantly worried about the risk
25 that this case could impact my ability to find future jobs. And this stress/risk lasted for the entire
26 case, and I’m still worried it may make it hard to find a job in the future.

27 8. Fourth, bringing this case also came with a major financial risk because, if I lost
28 the case, I would be required to pay the company’s costs and there was a chance they could try to

1 make me pay their attorneys' fees as well.

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

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

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7 By: 
8 Juan Carlos Bautista (Jun 10, 2025 06:52 PDT)
9 Juan Carlos Bautista
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