

Joshua I. White (State Bar No. 278166)
William M. Hogg (State Bar No. 338196)
LAUREL EMPLOYMENT LAW
808 Wilshire Boulevard, Suite 200
Santa Monica, CA 90401
Telephone: (323) 551-9221
josh@laurelemploymentlaw.com
william@laurelemploymentlaw.com

*Attorneys for Segura, the Hourly Employees, the
State of California, and Aggrieved Employees*

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

YAJAIRA SEGURA, individually and for others
similarly situated, on behalf of the State of
California and Aggrieved Employees,

Plaintiffs,

vs.

COMPREHENSIVE MOBILE CARE, LLC; and
DOES 1 through 10, inclusive,

Defendant.

Case No. 30-2026-01541502-CU-OE-CXC
[Assigned to the Hon. Melissa McCormick, Dept.
CX105]

DECLARATION OF YAJAIRA SEGURA

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I, Yajaira Segura, declare as follows:

1. I am over the age of 18, of sound mind, and I am competent to make this statement. The facts contained within this declaration are within my personal knowledge and I swear they are true and correct.

2. I am the named plaintiff in the above-referenced matter and submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement.

3. Because I believe I have provided invaluable assistance during the course of the dispute with Comprehensive Mobile Care, LLC (CMC), I am hopeful that the Court will approve my request for a \$10,000.00 service payment for my role as the Class Representative and PAGA Representative.

4. I am a former employee of CMC. I worked for CMC from approximately December 2022 to July 2025 as a non-exempt, hourly-paid dental assistant. Throughout my employment, I was subject to CMC's policies and practices that have been alleged as unlawful in the First Amended Class and PAGA Action Complaint ("FAC") as well as the PAGA Notice sent to CMC and the Labor & Workforce Development Agency ("LWDA").

5. I engaged in an interactive process with CMC prior to filing a lawsuit, and ultimately filed this lawsuit, 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. While working at CMC, I was aware other non-exempt employees like me were required to work similar hours and were subject to the same practices that caused my concerns.

6. By originating this lawsuit, I hoped that I might be able to change CMC's policies to better protect the working conditions of my co-workers and other non-exempt employees like me. I also understood it was my duty as the Class Representative and PAGA Representative to represent the interests of the class, represent the interests of the LWDA, and represent the interests of other potentially aggrieved employees, to remain informed about the ongoing dispute and lawsuit, help my attorneys, provide information to my attorneys, and to stay updated on the case.

7. Prior to commencing this case, I provided Laurel Employment Law with a detailed account of the facts related to my employment with CMC, as well as material documents related to my employment such as pay stubs, screenshots of messages, and correspondence with CMC. Based on my conversations, my attorneys and I were able to identify instances when I was not paid correctly for all of my hours worked.

8. I have invested a lot of personal time and energy, both before the lawsuit was filed and while this lawsuit has been pending. I made it a priority to be actively involved because I wanted to do everything I can to assist my attorneys in pursuing my rights and to help the other workers who were subject to the same policies that I was. I regularly communicated with my attorneys and their staff to discuss updates on the case and to provide my attorneys with additional information.

9. I spent multiple hours looking for documents that my attorneys asked me to provide to help this case. I also spent substantial amount of time providing information to my attorneys to assist with the case.

10. I also made myself available during the mediation for this case and I kept in regular contact with my attorneys before and after the mediation to ensure that any questions my attorneys had could be answered.

11. I also reviewed documents filed in this case, including the settlement-related documents.

12. I believe the settlement is a good settlement and I would recommend that the Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had the opportunity to represent the class and to represent the LWDA and other potentially aggrieved employees in this matter. I am also glad that I was able to recover money through a settlement for the class and in the PAGA matter. I have also observed my attorneys' work throughout this case and I believe they have been thorough, diligent, prompt, courteous, and professional.

13. I estimate that I spent at least 40 hours on this case since I first contacted Laurel Employment Law.

1 14. I did not make the decision to pursue this action or file this case lightly. I was
2 concerned by the attention a lawsuit, especially a class action lawsuit, would attract. My name
3 would be associated with a lawsuit that I filed against my former employer and I am mindful that
4 future employers might find out that I sued a former employer, which could hurt my employability.
5 In a competitive job market, this factor may weigh heavily against me.

6 15. Standing up for myself and the rights of others was not an easy decision, and I am
7 relieved that this dispute is coming to an end.

8 16. I respectfully request the Court award me \$10,000 as a service payment. I am
9 receiving no additional compensation other than the compensation provided for in the settlement.
10 Based on my involvement in this case and the benefits provided to my co-workers, I can say I helped
11 represent the other workers who may have been too afraid to say anything to management (or may
12 have been unaware of their rights) because they did not want to risk losing their jobs or risk the
13 stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping
14 my fellow co-workers.

15 17. Although I continue to fear that employers may find out that I participated in this
16 lawsuit and hold it against me, I felt that important rights were at stake that hurt myself and other
17 employees.

18 I declare under penalty of perjury under the laws of the State of California that the foregoing
19 is true and correct.
20
21

22 Executed on: 4/8/2026 at Van Nuys, California.

DocuSigned by:

yajaira segura

YAJAIRA SEGURA