

Kane Moon (SBN 249834)
E-mail: kmoon@moonlawgroup.com

Daniel J. Park (SBN 274973)
E-mail: dpark@moonlawgroup.com

MOON LAW GROUP, PC
725 S. Figueroa St., 31st Floor
Los Angeles, California 90017
Telephone: (213) 232-3128
Facsimile: (213) 232-3125

Attorneys for Plaintiff Ricardo F. Flores

Janelle Carney (#201570)
JANELLE CARNEY- ATTORNEY AT LAW, APC
14758 Pipeline Avenue, Suite E
Chino Hills, CA 91709
Telephone: (909) 521-9609 / Facsimile: (909) 393-0471
E-mail: Janelle@JanelleCarneyLaw.com
(Additional Plaintiffs' counsel listed on next page)

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

RICARDO F. FLORES, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

PASADENA HOSPITAL ASSOCIATION,
LTD., a California corporation; and DOES 1
through 10, inclusive,

Defendants

SANDRA YVETTE LAGUNAS, STEPHANIE
ESTELA CERTEZA, individually and on behalf
of all others similarly situated,

Plaintiff(s),

v.

PASADENA HOSPITAL ASSOCIATION,
LTD.; a California nonprofit corporation and
DOES 1 through 100,

Defendants.

Flores Case No.: 23STCV27387
Lagunas Case No. 23AHCV02007

*[Assigned for all purposes to The
Hon. Elihu M. Berle, Department 6]*

**DECLARATION OF RICARDO FLORES
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
REPRESENTATIVE ACTION
SETTLEMENT**

*[Filed with Notice of Motion and Motion for
Preliminary Approval of Class and PAGA
Representative Action Settlement;
Declarations of Kane Moon, Janelle Carney,
and Manny Starr, Declaration of Settlement
Administrator, and Declarations of Plaintiffs
and [Proposed] Order]*

PRELIMINARY APPROVAL HEARING

Date: December 3, 2025

Time: 9:00 a.m.

Dept.: 6

Action Filed: November 7, 2023

Trial Date: None Yet

1 Manny Starr (319778)
2 manny@frontierlawcenter.com
3 **FRONTIER LAW CENTER**
4 6200 Canoga Avenue, Suite 470
5 Woodland Hills CA 91367
6 Telephone: (818) 914-3433/ Facsimile: (818) 914-3433
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I, Ricardo Flores, declare as follows:

JOB DUTIES AND EXPERIENCE

DUTIES OF A CLASS REPRESENTATIVE

5. This case was filed on November 7, 2023. I have never asked to be relieved from my role as a proposed Class Representative. I have made myself available whenever my attorneys wanted to discuss aspects of my employment at Huntington Hospital, and I remain

1 committed to seeing this matter through to the end.

2 6. I have conferred with my attorneys about the settlement proposed in this case
3 and I understand the factors and risks that need to be considered when evaluating a settlement.

4 7. I am asking to be the stand-in for other employees of Defendant. I accept my
5 duties to the Class and will not, and have not, put myself and my interests before the Class. I
6 understand that as Class Representative I cannot quit. I accept these duties and request that I
7 be approved as the Class Representative for purposes of this Settlement.

8 COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY

9 8. I believe Defendant failed to pay me all wages and compensation owed by
10 failing to pay for off-the-clock work, failing to provide all rest and meal breaks and failing to
11 provide premiums for missed breaks, and failing to reimburse necessary business expenses. I
12 also believe Defendant failed to provide accurate wage statements and failed to timely pay
13 final wages pursuant to Labor Code § 203.

14 9. I believe Defendant's illegal wage and hour practices that affected me also
15 affected all employees who worked in similar non-exempt positions. For example, I believe
16 that others working in non-exempt positions were also deprived meal and rest breaks, and
17 deprived of premiums for the same, and were not paid all wages.

18 10. I am not aware of anything that would raise unique defenses to my claims, as
19 opposed to the claims of the Class. I am not suing for anything unique to me. Rather, my
20 claims are based upon the same facts that relate to the rest of the Class.

21 11. I do not believe that I have any conflicts with the class members included in this
22 proposed settlement. I do not have any intention of taking any action that would place me in a
23 position that is hostile to other class members.

24 SERVICES AS A CLASS REPRESENTATIVE

25 12. I believe that if not for my stepping forward and assuming the duty of
26 protecting the interests of other employees of Defendant, it is likely that the interests of the
27 Class would neither have been prosecuted, nor benefited. To my knowledge, other than the
28 litigation encompassed by this proposed Settlement, there is no other litigation, on a class or

1 individual basis, concerning the claims in this settlement. Nor has Defendant pointed to any.

2 13. I have assumed long-lasting risk in pursuing this Action. Because information is
3 readily available online, I face an increased risk that future employers may discover
4 information about this lawsuit and have a negative reaction to learning that I sued an
5 employer. This may make it harder for me to obtain future employment.

6 14. I have devoted a substantial amount of my time to ensure a fair result for the
7 Class. I have been actively involved in this case and had many discussions with the attorneys and
8 staff at Moon Law Group, PC. We discussed Defendant's wage and hour policies, my claims in
9 this case, litigation strategy, potential witnesses, updates on how the case was proceeding, and
10 how I could help the case. I reviewed and discussed Defendant's discovery requests to me and
11 fully participated in the preparation of responses. I also spent a full day with my attorneys
12 preparing for my deposition and I was deposed by Defendant's counsel for an entire day. I
13 remained in regular communication with my attorneys regarding mediation discovery and
14 settlement discussions that the Parties had during the course of litigation. I also identified
15 employees and other witnesses and provided information and documents to my attorneys to assist
16 them in preparing the case.

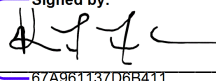
17 15. I also spent time reviewing and discussing the proposed settlement agreement as
18 well as other documents with my attorneys and reviewing my own records for documents from
19 my employment that would be potentially relevant to the case. I also assisted my attorneys in
20 preparing for mediation, and, on the day of mediation, I both made myself available
21 throughout the day and responded promptly to all my attorneys' inquiries.

22 16. After the mediation, I reviewed the negotiated Memorandum of Understanding
23 with my attorneys ensuring its terms were fair and adequate. In my opinion, the proposed
24 settlement is in the best interests of both the State and the proposed class. Furthermore, I
25 believe the settlement amount is fair given that all class members will receive payments
26 without going to the trouble of filing their own lawsuits.

17. In total, I estimate that I have spent between fifty (50) to sixty (60) hours of my time in connection with this case. I expect to spend additional time assisting my attorneys in connection with settlement approval.

18. I understand the proposed settlement includes a proposed Class Representative Service Payment to me in the amount of ten thousand dollars (\$10,000.00). I understand that the Court has discretion on whether to award the proposed incentive payment. I believe the proposed incentive payment is fair compensation for the time and risks I have taken to help the State and the Class.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed on October ²¹, 2025, at Los Angeles County, California.

Signed by: 

67A961137D6B411...
Ricardo F. Flores