

02/20/2025

By: A. Turner Deputy

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Attorneys for Plaintiff Larry Norell Goosby, individually,
and on behalf of all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

LARRY NORELL GOOSBY, individually, and
on behalf of all others similarly situated,

Plaintiff,

v.

CIMINOCARE, INC., a California Corporation;
and DOES 1 through 10, inclusive,

Defendants.

Case No. 34-2022-00329033

*Assigned for all purposes to:
Hon. Lauri A. Damrell, Dept. 22*

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: March 14, 2025
Time: 9:00 a.m.
Dept.: 22

1 I, John G. Yslas, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all of the courts of the State of
3 California. I am a senior partner at Wilshire Law Firm, PLC (“WLF”), counsel for Plaintiff Larry
4 Norell Goosby (“Plaintiff”) in this matter. I am thoroughly familiar with and have personal
5 knowledge of all of the facts set forth herein.

6 2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of Class
7 Action and PAGA Settlement.

8 3. Plaintiff is represented by WLF. The attorneys at WLF performed significant work
9 and expended litigation costs in prosecuting this matter with no guarantee of payment.

10 4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the
11 nation’s Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600
12 employees. WLF is actively and continuously practicing in employment litigation, representing
13 employees in both individual and class actions in both state and federal courts throughout
14 California.

15 5. WLF is qualified to handle this Litigation because its attorneys are experienced in
16 litigating Labor Code violations in individual, class action, and representative action cases. WLF
17 has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as
18 class actions involving consumer rights and data privacy litigation.

19 6. I graduated from the University of California, Santa Barbara with High Honors in
20 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law
21 School in 1996.

22 7. Upon graduating from law school in 1996, I worked for a boutique law firm
23 practicing general litigation which included employment law matters. Since 2000 (that is, the last
24 23 years) my practice has been exclusively focused on labor and employment matters including
25 handling wage and hour class, collective and representative actions (including the California
26 Private Attorneys General Act, or “PAGA”), including in the international law firms of Morgan,
27 Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP (where I was a
28 partner and a national Vice Chair of the Labor and Employment Group), Norton Rose Fulbright

1 LLP (where I was a partner) and Seyfarth Shaw (where I was a partner and member of the Wage
2 and Hour Practice Group). During my time at these law firms, I was the primary attorney or took
3 a major leading role in defending employers on numerous wage and hour class, collective and
4 representative actions.

5 8. In late June 2022 I left Seyfarth Shaw and joined my current firm, The Wilshire
6 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
7 hour class and representative actions litigating such matters on behalf of plaintiff employees in
8 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
9 defendants, I have successfully mediated the resolution of many wage and hour class, collective,
10 and representative actions. Just since starting to settle cases in late April 2023 I have already
11 successfully mediated matters in which I have been counsel or co-counsel resulting in over \$85
12 million in settlements which are in the process of being finalized, and with numerous upcoming
13 mediations scheduled. In those and numerous other matters, I have managed and assisted with the
14 litigation and settlement of many wage and hour PAGA and class actions. In those actions, I
15 performed similar tasks as those performed in the course of prosecuting this action.

16 9. I have received numerous awards for my legal work. For example, from 2015 to
17 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson Reuters).
18 have also served on numerous prominent boards and in other leadership positions, including
19 currently serving as Southern California Regional President for the Hispanic National Bar
20 Association and on the board of directors of the Mexican American Bar Foundation. I also
21 previously served on the 5-member Los Angeles Civil Service Commission, which generally
22 oversees the personnel decisions for the City of Angeles.

23 10. I have also published numerous blogs on labor and employment issues including on
24 wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-Impact on
25 Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You Really
26 Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a partner with
27 Seyfarth Shaw LLP). I have also been a presenter at numerous conferences, including being a
28 presenter involving the “Employment Law Update” at a National Employment Law Council

conference. I currently bill at an hourly rate of \$1,000.00.

11. Samantha A. Smith is a Senior Attorney at WLF where her practice is focused on managing wage and hour class action and PAGA settlements. Ms. Smith was admitted to the California Bar in December of 2004, and received a J.D. from University of California, Hastings College of the Law and a B.A. from University of California, Davis. Ms. Smith has dedicated her 20-year career to plaintiffs'-side class action litigation. Her wealth of experience includes successful work on all stages of class action litigation, including class action appeals, class certification motions, and class settlements. See, e.g., *Blue Diamond Growers Product Labeling Cases*, JCCP No. 4822 (Los Angeles County Superior Court) (false advertising of Blue Diamond food products); *Adam vs. eHealth, Inc.*, Case No. 17CV309050 (Santa Clara Superior Court) (employee data breach); *Overton v. Armour-Eckrich Meats, LLC*, Case No. CIVDS1501325 (San Bernardino County Superior Court) (unpaid wages, meal period and rest break claims, and PAGA violations for nonexempt employees); *DeLeon et al. v. Westlake Services, LLC*, Case No. BC 526750 (Los Angeles County Superior Court) (unpaid overtime, meal period and rest break claims for call center employees); *Sawyer v. Retail Data, LLC*, Case No. 30-2014-00753767-CU-OE-CXC (Orange County Superior Court) (unpaid wage and rest break claims for piece rate workers); *Nguyen v. Pharmerica Corporation et al.*, Case No. 30-2014-00716072-CU-OE-CXC (Orange County Superior Court) (unpaid wages and unreimbursed expenses for pharmacists); *Laumea v. Performance Food Group, Inc.*, Case No. CIVDS1407509 (San Bernardino Superior Court) (unpaid wages, meal and rest break claims for non-exempt employees); *Durroh v. East West Bank*, Case No. BC528860 (Los Angeles Superior Court) (overtime claims for failure to include bonuses in regular rate of pay for bank workers); *Gonzalez et al. v. SFFI Company, Inc. et al.*, Case No. CIVDS1504287 (San Bernardino Superior Court) (unpaid wages, meal period and rest break claims for non-exempt employees). Ms. Smith currently bills at an hourly rate of \$850.00.

12. Jeffrey C. Bils is a Senior Attorney at WLF. He graduated from the University of Wisconsin-Madison with a Bachelor of Arts in Journalism and German, and received his Juris Doctor from the University of California, Los Angeles School of Law in 2014. During law school, Mr. Bils was a senior editor on the UCLA Law Review and an articles editor on the entertainment

1 law review. Mr. Bils served as a judicial extern for the Hon. Consuelo Bland Marshall of the United
2 States District Court for the Central District of California, and for the Hon. Sandra R. Klein of the
3 United States Bankruptcy Court for the Central District of California. He graduated 7th in his
4 graduating class in law school and was admitted to practice law in the State of California the same
5 year. Since graduating from law school, Mr. Bils has focused his legal work primarily on
6 employment matters, including wage and hour class and representative action litigation, and has
7 helped obtain dozens of settlements on behalf of employees, as well as on behalf of employers
8 during his years practicing employment defense. He is a member of the Beverly Hills Bar
9 Association, where he currently serves as a member of the Board of Governors and is a past Chair
10 of the Labor & Employment Law Section Executive Committee. Mr. Bils is also a member of the
11 California Employment Lawyers Association. Mr. Bils currently bills at an hourly rate of \$650.00.

12 13. Aram Boyadjian is an associate attorney at WLF. Mr. Boyadjian graduated from the
13 University of California, Los Angeles with a Bachelor of Arts in Political Science. He received his
14 Juris Doctor from Loyola Law School. During law school, he was a member of the student editorial
15 board for the International and Comparative Law Review. Since being admitted to practice law in
16 California in January 2021, his practice has mainly been focused on wage and hour class action
17 litigation. Mr. Boyadjian currently bills at an hourly rate of \$550.00.

18 14. Andrew Sandoval is an associate attorney at WLF. Mr. Sandoval graduated from
19 Azusa Pacific University with a Bachelor of Arts in Economics. He received his Juris Doctor from
20 Loyola Law School. During law school, he was a Vice-President of La Raza de Loyola. Since
21 being admitted to practice law in California in 2022, his practice has mainly been focused on wage
22 and hour class action litigation. Mr. Sandoval currently bills at an hourly rate of \$450.00.

23 15. WLF's hourly rates are comparable to those charged by other class action plaintiffs'
24 counsel and the firms defending class actions. WLF's hourly rates have been approved by other
25 courts in California. *See, e.g., Matthew Veliz v. DrinkPak, LLC*, Los Angeles County Superior
26 Court, Case No. 22STCV37384, *Ismael Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter
27 County Superior Court Case No. CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*,
28 Ventura County Superior Court, Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The De*

Ruosi Group, LLC, San Joaquin Superior Court, Case No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch, LLC et al*, Los Angeles Superior Court, Case No. 23STCV04299; *Wing v. Road Machinery, LLC et al*, Kern County Superior Court, Case No. BCV-22-102896; *Hernandez v. SGPS Showrig Los Angeles, Inc.*, Los Angeles Superior Court, Case No. 22STCV28155; *Azevedo v. Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case No. VCU293325. The total hours expended on this action are reasonable and in line with comparable cases.

16. WLF has performed significant work and incurred litigation costs in prosecuting this matter with no guarantee of any payment. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with 149.6 hours of work resulting in \$109,480.00 in fees. WLF dedicated significant resources to this case by dividing the tasks required according to skill level. The hours expended by each attorney were not duplicative and reflect the extensive investigation and analysis that was required to achieve this Settlement. This amount does not include the time Class Counsel will spend at the final approval hearing and assisting the Settlement Administrator following final approval. The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
John G. Yslas	27.2	\$1000.00	\$27,200.00
Samantha A. Smith	15	\$950.00	\$14,250.00
Jeffrey C. Bils	41.6	\$850.00	\$35,360.00
Aram Boyadjian	30.6	\$550.00	\$16,830.00
Andrew Sandoval	35.2	\$450.00	\$15,840.00

17. The risk factors present in this case favor the application of a 1.95 multiplier. To begin, Class Counsel has singularly assumed the risk and costs of litigation purely on a contingency basis. And, while Plaintiff is confident in the merits of his claims, a legitimate controversy exists as to each cause of action posing an actual risk that Plaintiff may not succeed at class certification and/or trial. Any of these obstacles could have prevented recovery completely, meaning Class

Counsel would have been left with no compensation for all the time and money invested in litigating this case. Despite these risks, Class Counsel took this case on a contingency basis so that Class Members (a particularly vulnerable group of hourly paid workers) could be compensated for their unpaid wages. Consequently, Class Counsel was precluded from focusing on, or taking on, other cases which could have resulted in a larger, and less risky, monetary gain.

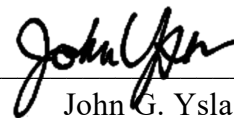
18. In litigation costs, WLF has spent \$19,799.42 on items such as filing fees, service fees, mediation fees, and expert fees. True and correct copies of WLF's cost reports in this matter are attached hereto as **Exhibit 1**. All of the costs incurred were reasonable and necessary for the prosecution of this case.

19. Class Counsel has negotiated a settlement here that they believe is fair, reasonable, and adequate based on their prior experience litigating these types of cases.

20. To date, the LWDA has not responded to or objected to the Settlement in this matter.

21. Attached hereto as **Exhibit 2** is a true and correct copy of the Declaration of Plaintiff Larry Norell Goosby in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement (submitted on June 5, 2024).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 20, 2025 at Los Angeles, California.



John G. Yslas

EXHIBIT 1

Wilshire Law Firm, PLC
Client Costs Detailed Report

02/10/25

Accrual Basis

All Transactions

Type	Date	Num	Due Date	Class	Source Name	Memo	Amount	Balance
500000 - COS								
501500 - Court Filing Fees								
Credit C...	11/09/2022			CiminoCare(Goosby).W&H	Sacramento Court	893156-231828 CiminoCare(Goosby).W&H	2.00	2.00
Bill	11/03/2022	52251	12/03/2022	CiminoCare(Goosby).W&H	Valpro Attorney Services, LLC	52251 CiminoCare(Goosby).W&H New Case Filing	1,719.50	1,721.50
Bill	12/21/2022	53471	01/20/2023	CiminoCare(Goosby).W&H	Valpro Attorney Services, LLC	53471-CiminoCare(Goosby).W&H-File POS	95.00	1,816.50
Bill	12/27/2022	53826	01/26/2023	CiminoCare(Goosby).W&H	Valpro Attorney Services, LLC	53826-CiminoCare(Goosby).W&H-File Notice of CMC and Order	140.00	1,956.50
Bill	09/08/2023	63980	10/08/2023	CiminoCare(Goosby).W&H	Valpro Attorney Services, LLC	63980-CiminoCare(Goosby).W&H-New Case Filing	1,721.50	3,678.00
Bill	09/14/2023	64485	10/14/2023	CiminoCare(Goosby).W&H	Valpro Attorney Services, LLC	64485-CiminoCare(Goosby).W&H-File Joint CMS and deliver CC to De...	135.00	3,813.00
Bill	09/21/2023	65186	10/21/2023	CiminoCare(Goosby).W&H	Valpro Attorney Services, LLC	65186-CiminoCare(Goosby).W&H-File Notice of Remote Appearance a...	135.00	3,948.00
Bill	11/14/2023	67796	12/14/2023	CiminoCare(Goosby).W&H	Valpro Attorney Services, LLC	67796 CiminoCare(Goosby).W&H-File Joint CMS and deliver CC to De...	175.00	4,123.00
Credit C...	01/23/2024	22036943		CiminoCare(Goosby).W&H	One Legal LLC	22036943-Notice-Atty Svc for Court Filing-231828 Larry Norell Goosby ...	18.43	4,141.43
Credit C...	01/23/2024	22037100		CiminoCare(Goosby).W&H	One Legal LLC	22037100-Notice-Atty Svc for Court Filing-231828 Goosby, Et Al, vs Ci...	18.43	4,159.86
Credit C...	03/15/2024	22454725		CiminoCare(Goosby).W&H	One Legal LLC	22454725-Joint CMS-Atty Svc for Court Filing-231828 Larry Norell Goo...	18.43	4,178.29
Credit C...	03/19/2024	22454726		CiminoCare(Goosby).W&H	One Legal LLC	22454726-Joint CMS-Atty Svc for Court Filing-231828 Larry Norell Goo...	51.48	4,229.77
Credit C...	05/10/2024	22869151		CiminoCare(Goosby).W&H	One Legal LLC	22869151-Joint CMS-Atty Svc for Court Filing-231828 Larry Norell Goo...	27.69	4,257.46
Credit C...	05/31/2024	23019250		CiminoCare(Goosby).W&H	One Legal LLC	23019250-CMS-Atty Svc for Court Filing-231828 Goosby, Et Al, vs Cimi...	26.66	4,284.12
Credit C...	06/04/2024	23046197		CiminoCare(Goosby).W&H	One Legal LLC	23046197-231828-Atty Svc for Court Filing-Notice-CiminoCare(Goosby)...	24.61	4,308.73
Credit C...	06/06/2024	23059201		CiminoCare(Goosby).W&H	One Legal LLC	23059201-231828-Atty Svc for Court Filing-POS, Approv of Settlem-Cl...	90.49	4,399.22
Credit C...	06/06/2024	23059202		CiminoCare(Goosby).W&H	One Legal LLC	23059202-231828-Atty Svc for Court Filing-POS, Motion for Prelim Appr...	61.77	4,460.99
Credit C...	06/14/2024	23123363		CiminoCare(Goosby).W&H	One Legal LLC	23123363-231828-Atty Svc for Court Filing-Joint Case Mgmt Stmt-Cimi...	28.72	4,489.71
Credit C...	06/14/2024	23123436		CiminoCare(Goosby).W&H	One Legal LLC	23123436-231828-Atty Svc for Court Filing-CMS-CiminoCare(Goosby)...	28.72	4,518.43
Credit C...	08/19/2024	23548781		CiminoCare(Goosby).W&H	One Legal LLC	23548781-231828-Atty Svc for Court Filing-Declaration-CiminoCare(Go...	27.69	4,546.12
Credit C...	08/19/2024	23548782		CiminoCare(Goosby).W&H	One Legal LLC	23548782-231828-Atty Svc for Court Filing-Declaration-CiminoCare(Go...	51.48	4,597.60
Total 501500 - Court Filing Fees							4,597.60	4,597.60
502500 - Legal Expenses								
Credit C...	07/10/2023			CiminoCare(Goosby).W&H	Department of Industrial Relations	ORD-000239613 (231828) CiminoCare(Goosby).W&H	75.00	75.00
Bill	04/08/2024	0849974595-1	04/18/2024	CiminoCare(Goosby).W&H	Thomson Reuters - West Publishi...	Legal Research-CiminoCare(Goosby).W&H	11.49	86.49
Bill	09/06/2022	846968675	09/16/2022	CiminoCare(Goosby).W&H	Thomson Reuters - West Publishi...	Legal Research-CiminoCare(Goosby).W&H	23.52	110.01
Bill	01/11/2023	847619313	01/21/2023	CiminoCare(Goosby).W&H	Thomson Reuters - West Publishi...	Legal Research-CiminoCare(Goosby).W&H	14.11	124.12
Bill	05/04/2023	848257744	05/14/2023	CiminoCare(Goosby).W&H	Thomson Reuters - West Publishi...	Legal Research-CiminoCare(Goosby).W&H	33.80	157.92
Bill	05/04/2023	848257744	05/14/2023	CiminoCare(Goosby).W&H	Thomson Reuters - West Publishi...	Legal Research-CiminoCare(Goosby).W&H	11.51	169.43
Bill	06/06/2023	848413295	06/16/2023	CiminoCare(Goosby).W&H	Thomson Reuters - West Publishi...	Legal Research-CiminoCare(Goosby).W&H	76.21	245.64
Total 502500 - Legal Expenses							245.64	245.64
502700 - Mediation Fees								
Bill	12/26/2023	2023.0180P	01/05/2024	CiminoCare(Goosby).W&H	Leb Dispute Resolutions, Inc	2023.0180P-CiminoCare(Goosby).W&H-Mediation Fees Sked 02/20/24	7,500.00	7,500.00
Total 502700 - Mediation Fees							7,500.00	7,500.00
503200 - Process Service Fees								
Bill	12/12/2022	53433	01/11/2023	CiminoCare(Goosby).W&H	Valpro Attorney Services, LLC	53433 CiminoCare(Goosby).W&H Serree: CiminoCare S&C	110.00	110.00
Total 503200 - Process Service Fees							110.00	110.00
503300 - Professional Fees								
Bill	03/28/2024	10681	04/07/2024	CiminoCare(Goosby).W&H	Berger Consulting Group, LLC	10681-CiminoCare(Goosby).W&H-14.60 hours of work	7,300.00	7,300.00
Total 503300 - Professional Fees							7,300.00	7,300.00
Total 500000 - COS							19,753.24	19,753.24
TOTAL							19,753.24	19,753.24

Expenses Subtotals - Filtered Exp. Type

As of 2024-04-03 15:42:49 Pacific Standard Time/PST • Generated by Abraham Villa

Filtered By
Show: All matters
Matter: ID equals a0L5G00000RKtkp
Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Larry Goosby - Wage & Hour: 8/16/2022	E102 — Printing	4/12/2023	E-3064005			\$0.25			\$0.25
		12/23/2022	E-2990361			\$0.25			\$0.25
		12/21/2022	E-2990133			\$7.50			\$7.50
	Subtotal	Sum				\$8.00	\$0.00	\$0.00	\$8.00
		Count	3						
	E108 — Postage	1/24/2024	E-3175212			\$10.60			\$10.60
		1/24/2024	E-3175211			\$0.64			\$0.64
		7/7/2023	E-3130238			\$7.09			\$7.09
		7/7/2023	E-3130220			\$7.09			\$7.09
		7/7/2023	E-3130219			\$7.09			\$7.09
	Subtotal	Sum				\$32.51	\$0.00	\$0.00	\$32.51
		Count	5						
Subtotal		Sum				\$40.51	\$0.00	\$0.00	\$40.51
		Count	8						
Total		Sum				\$40.51	\$0.00	\$0.00	\$40.51
		Count	8						

EXHIBIT 2

1 John G. Yslas (SBN 187324)
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7 Los Angeles, California 90010
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9 *Attorneys for Plaintiff*

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11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF SACRAMENTO**

14 LARRY NORELL GOOSBY, individually, on
behalf of all others similarly situated, and on
15 behalf of the State of California and other
aggrieved persons,

16 *Plaintiff,*

17 v.

18 CIMINOCARE, INC., a California Corporation,
19 and DOES 1 through 10, inclusive,

20 *Defendants.*

Case No.: 34-2022-00329033

CLASS & REPRESENTATIVE ACTION

**PLAINTIFF LARRY NORELL
GOOSBY'S DECLARATION IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Filed with Notice of Motion and Motion,
Memorandum of Points and Authorities, the
Declaration of John G. Yslas, and [Proposed]
Order]

PRELIMINARY APPROVAL HEARING

Date:

Time:

Dept:

Complaint filed: October 31, 2022

FAC filed:

Trial date: Not set

DECLARATION OF LARRY NORELL GOOSBY

I, LARRY NORELL GOOSBY, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am the proposed class representative in this action and submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class & Representative Action Settlement. I believe I have provided invaluable assistance during the course of this case, and I respectfully hope the Court will approve my request of a \$15,000 service payment for my role as the Class Representative.

3. I am a former employee of Defendant CiminoCare, Inc. I worked for Defendant from approximately March 2022 to approximately August 2022 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to Defendant's patterns and practices that have been alleged as unlawful in the Class & Representative Action Complaint and Private Attorneys General Action Notice sent to Defendant and the Labor & Workforce Development Agency.

4. I have pursued 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 my meal and rest breaks. While working for Defendant, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks. My meal and rest breaks were often interrupted by supervisors and co-workers asking me to perform work tasks. I frequently performed work tasks while off-the-clock before the start of my shift and after the end of my shift. I also observed my co-workers working long hours without taking breaks. I was not reimbursed for necessary business-related expenses.

5. By participating in this lawsuit as a proposed Class Representative, I hoped that I might be able to change Defendant's practices to better protect the working conditions of my co-workers. I also understood it was my duty as the Class Representative to represent the best interests of the class, know about the lawsuit, help my attorneys, and keep updated on the case.

6. Prior to commencing this case, I provided Wilshire Law Firm with a detailed account of the facts related to my employment with Defendant. Based on our conversations, my attorneys

1 and I were able to identify instances when I was not paid correctly.

2 7. I have invested a lot of personal time and energy while this lawsuit has been pending.
3 I made it a priority to be actively involved because I wanted to do everything I could to help my
4 attorneys in prosecuting this case. I regularly communicated with my attorneys to discuss updates on
5 the case and to provide information. I communicated with my attorneys via phone calls. Some of
6 these phone calls lasted up to 30 minutes.

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

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

12 10. I believe the settlement is a good settlement, and I would recommend that the Court
13 approve it, because I believe it is fair, adequate, and reasonable. I am glad that I have had the
14 opportunity to represent the Class in this lawsuit, and that I was able to recover money through a
15 settlement for the Class. I have also observed my attorneys' work throughout this case, and I believe
16 they have been thorough, diligent, prompt, courteous, and professional.

17 11. Standing up for myself and the rights of others was not an easy decision, and I am
18 relieved that this is coming to an end. I estimate that I spent at least 45 hours on this case.

19 12. I did not make the decision to file a class action lightly. I was concerned by the
20 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
21 associated with a lawsuit that I filed against my former employer. I was aware that it is possible to
22 perform background checks of publicly filed documents on the Internet, sometimes with nothing
23 more than a simple Google search. I am mindful that employers might find out that I sued a former
24 employer, and this could hurt my employability.

25 13. I respectfully ask that the Court award me a \$15,000 service payment. I am receiving
26 no additional compensation other than the compensation provided for in the settlement. Based on
27 my involvement in this case and the benefits provided to my former co-workers, I can say I helped
28 stand up for the other workers who may have been too afraid to say anything to management because

1 they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid
2 to take that risk, because I strongly care about helping my current and former co-workers. I also
3 continue to fear that any employer may find out that I participated in this lawsuit and hold it against
4 me. In a competitive job market, this factor may weigh heavily against me. Nevertheless, I felt that
5 important rights were at stake that hurt myself and other employees.

6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct.

8 Executed on the 20th day of May 2024, at Sacramento, California.

9
10 DocuSigned by:

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12 06B274948E0B4FE

13 LARRY NORELL GOOSBY
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