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Attorneys for Plaintiffs

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

RONALD ROBERTO, individually, and on
behalf of other members of the general public
similarly situated and on behalf of the State
of California, the Labor & Workforce
Development Agency, and other aggrieved
employees pursuant to the California Private
Attorneys General Act

Plaintiff,

vs.

IMPERIAL HEALTH HOLDINGS, a
California corporation; IMPERIAL
MANAGEMENT ADMINISTRATORS
SERVICES, an unknown business entity;
IMPERIAL MANAGEMENT SERVICES
GROUP, LLC, a California limited liability
company; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 22STCV36190
Related to: 24STCV08086

Honorable Elihu M. Berle
Department Spring Street 6

CLASS ACTION

**DECLARATION OF JESSICA VELASCO
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Hearing Date: May 28, 2026
Hearing Time: 10:00 a.m.
Department: Spring Street 6

Complaint Filed: November 15, 2022
FAC Filed: August 2, 2024

Trial Date: None Set

DECLARATION OF JESSICA VELASCO

I, Jessica Velasco, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named Plaintiff in the related action entitled *Velasco v. Imperial Management Services Group et al.*, Los Angeles Superior Court, Case No. 24STCV0808, which is being included in the Settlement with the above-captioned action. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendants Imperial Management Services Group, LLC, Imperial Health Holdings, and Imperial Management Administrators Services (collectively, “Defendants”) from approximately June 2020 to approximately February 2023 as an hourly-paid or non-exempt employee. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing my related case and joining this matter, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the matter, I have spent time speaking with my attorneys regarding the cases and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I

1 had obtained.

2 4. As the cases progressed, I was available to answer any questions my attorneys had,
3 and available to speak and meet with my attorneys whenever they needed me. I responded to them
4 as quickly as possible and gave them as much information and identified as many documents as I
5 could. I spent time speaking with my attorneys about the cases, identifying potential witnesses,
6 providing my attorneys with documents and information concerning the cases, and also describing
7 policies, practices, and procedures of Defendants.

8 5. As far as the settlement is concerned, I was available to review documents and
9 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
10 Settlement Agreement and discussed the questions I had regarding the potential settlement with my
11 attorneys before signing the settlement papers.

12 6. I think my efforts helped to get the result obtained in this matter and my related
13 action, and as a potential class and PAGA representative, I respectfully request that the Court
14 award me an enhancement payment in the amount of \$7,500.00 for my efforts in pursuing and
15 participating in the matters, as well as my broader release of claims. Taking into consideration the
16 time that I have dedicated to the matters, I believe that this amount is reasonable.

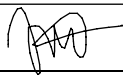
17 7. I am not related to anyone associated with Lawyers *for* Justice, PC. In addition, I
18 have no relationship or affiliation with the proposed *cy pres* recipient Legal Aid at Work.

19 8. I have not entered into any undisclosed agreements, nor have I received any
20 undisclosed compensation in this matter or my related action. The only compensation I will receive
21 is whatever amount the Court awards as an enhancement payment, as well as my share of the
22 settlement as a class member and aggrieved employee.

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

03/19/2026

25 Executed on this ____ day of March 2026, at Sun Valley, California.

26 Electronically Signed  2026-03-20 01:49:51 UTC - 76.33.233.183
Nintex AssureSign® 0d874678-8cb4-4c0b-b7d8-b4120137d23a

27 Jessica Velasco