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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 RONALD ROBERTO
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 RONALD ROBERTO

I, Ronald Roberto, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. 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 October 2019 to approximately October 2020 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 in general, and what it meant to be a named plaintiff and class representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff 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. Subsequently, I discussed and consulted with my attorneys regarding representative actions under the Private Attorneys General Act (“PAGA”) and I was informed of and came to understand what my duties and responsibilities would be as a PAGA representative.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case 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 or 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 had obtained.

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

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

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

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

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

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

03/19/2026

24 Executed on this ____ day of March 2026, at Walnut, California.

25 
26 Electronically Signed 2026-03-19 19:32:55 UTC - 47.150.133.172
Nintex AssureSign® 9b0d543b-94cf-460d-93bf-b412013867a0

27 Ronald Roberto
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