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Attorneys for Plaintiff GREGORIO PINEDA and the Class

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

GREGORIO PINEDA, individually and on behalf of others similarly situated, Case No.: 24STCV01618

Plaintiff,

vs.

ORTHOPAEDIC HOSPITAL dba
ORTHOPAEDIC INSTITUTE FOR CHILDREN
AND LUSKIN ORTHOPAEDIC INSTITUTE
FOR CHILDREN, a California Nonprofit
Corporation; ORTHOPAEDIC HOSPITAL
MEDICAL GROUP, INC., a California
Corporation; ORTHOPAEDIC INSTITUTE FOR
CHILDREN AMBULATORY SURGERY
CENTER, LLC, a California Limited Liability
Company; ORTHOPAEDIC INSTITUTE FOR
CHILDREN FOUNDATION, a California
Nonprofit Corporation; and DOES 1 through 25,
inclusive,

Defendants.

[Related to Case Nos. 24STCV07307,
24STCV03460, and 24STCV10042]

Honorable Elihu M. Berle
Department 6

**DECLARATION OF PLAINTIFF
GREGORIO PINEDA IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT, ATTORNEYS' FEES
AND COSTS, ENHANCEMENT
PAYMENTS, AND SETTLEMENT
ADMINISTRATION COSTS**

Date: May 21, 2026
Time: 9:00 a.m.
Dept: 6

Complaint Filed: January 19, 2024
Trial Date: Not Set

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9 Attorneys for Plaintiff CHARLES WILKINS and the Class

DECLARATION OF GREGORIO PINEDA

I, Gregorio Pineda, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the cases entitled *Gregorio Pineda v. Orthopaedic Hospital dba Orthopaedic Institute for Children and Luskin Orthopaedic Institute for Children, et al.*, Los Angeles County Superior Court Case No. 24STCV01618, and *Gregorio Pineda v. Orthopaedic Hospital dba Orthopaedic Institute for Children and Luskin Orthopaedic Institute for Children, et al.*, Los Angeles County Superior Court Case No. 24STCV07307. 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 Orthopaedic Hospital dba Orthopaedic Institute for Children and Luskin Orthopaedic Institute for Children; Orthopaedic Hospital Medical Group, Inc.; Orthopaedic Institute for Children Ambulatory Surgery Center, LLC; and Orthopaedic Institute for Children Foundation (collectively, “Defendants”) as an hourly-paid, non-exempt Environmental Services Technician at the Orthopaedic Institute for Children from approximately February 2021 to approximately December 2023.

3. Because I thought the practices at Defendants may not be lawful, I decided to seek legal advice about my work experiences at Defendants and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendants were held accountable for not properly compensating their employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the cases as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with Defendants, answering any questions my attorneys had

1 about the documents, providing information regarding the companies' practices and the duties of other
2 hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what
3 additional documents and information they could seek to obtain from Defendants.

4 5. I routinely checked in with my attorneys and their staff to make sure that they had all
5 of my most current information and any additional information that I had obtained. I made myself
6 available to answer any questions my attorneys had about Defendants' practices and treatment of their
7 employees whenever they needed me. I responded to them as quickly as possible and gave them as
8 much information as I could.

9 6. I understood that in the event this matter did not settle and proceeded with trial, I would
10 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
11 responsibilities that are necessary for this lawsuit.

12 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
13 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
14 also understood there was a risk of losing any job and/or income due to the time that I would have to
15 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In
16 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
17 claim or take the risk that I took in bringing this action.

18 8. I reviewed the settlement agreement, discussed the settlement agreement with my
19 attorneys, and asked them questions before signing it.

20 9. I believe that I have done everything that my attorneys have asked of me and tried, to
21 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
22 I have spent approximately 40-45 hours participating in this matter as described above. I believe my
23 efforts helped get the result obtained in this matter.

24 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
25 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
26 throughout the course of this litigation I have considered the interests of the Class and put them before
27 my own personal interests.

28 ///

11. I understand that incentive or enhancement awards are discretionary and intended to compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA action, and an acknowledgment of the benefits resulting from the representative's actions. I believe my work in this matter is meritorious on these points for the reasons set forth above.

12. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of \$10,000.00 for my efforts and active participation in the case and for the broader, general release of all claims that I have or may have against Defendants in connection with the settlement. Taking into consideration the time that I dedicated to this matter, I believe that this amount is reasonable.

13. I understand that Blackstone Law, APC will share the attorneys' fees in this matter with Bibiyan Law Group, P.C. and Hinden & Breslavsky, APC. I agreed to this in writing. I understand that the amount of attorneys' fees will not increase as a result of this fee sharing.

14. I am not related to anyone associated with Blackstone Law, APC, Bibiyan Law Group, P.C., or Hinden & Breslavsky, APC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 09/11/2025, at Los Angeles, California.

Gregorio Pineda

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