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Attorneys for Plaintiff Juan Manuel Gomez,
individually, and on behalf of all others similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA

JUAN MANUEL GOMEZ, individually and
on behalf of all others similarly situated,

Plaintiff,

vs.

WESTCOAST PARATRANSIT, INC.;
GOOD CARE MEDICAL TRANSPORT
NON-EMERGENCY; and DOES 1 through
20, inclusive,

Defendants.

Case No. 2024CUOE020092

Assigned For All Purposes To:
Hon. Jeffrey G. Bennett.
Department 21

**DECLARATION OF JUAN MANUEL
GOMEZ IN SUPPORT OF
PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

1 I, Juan Manuel Gomez, declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify,
3 I could and would do so competently under oath. I make this declaration, with the help of a
4 translator, in support of my Motion for Preliminary Approval of Class Action Settlement.

5 2. I worked for Defendants Westcoast Paratransit, Inc. and Good Care Medical
6 Transport Non-Emergency ("Defendants") as a non-exempt employee from about January 30,
7 2020 through January 22, 2025 in the position of Driver.

8 3. Based on my experience and knowledge of Defendants' wage and hour policies
9 and my familiarity with its employment practices, I worked with my attorneys to bring claims on
10 my own behalf as well as on behalf of other non-exempt employees of Defendants.

11 4. I am seeking to become a Class Representative in this case. I believe my
12 experiences are similar to Defendants' other non-exempt employees. I believe we were all subject
13 to the same employment policies and practices.

14 5. I do not have any conflicts with other non-exempt employees that would hinder my
15 ability to represent them. Therefore, I believe I will adequately represent Defendants' other non-
16 exempt employees.

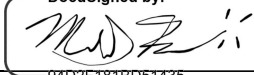
17 6. My interests as a named plaintiff in this litigation are not adverse to the interest of
18 the other non-exempt employees. My interests are the same as the interests of the other non-exempt
19 employees because we were all subject to the same policies and practices and were similarly injured
20 by Defendants' company-wide policies and practices. I am seeking the same recovery on behalf of
21 myself and other non-exempt employees, which is to collect unpaid wages, meal period premiums,
22 rest period premiums, and penalties that are owed by Defendants.

23 7. I have always kept the best interests of the other non-exempt employees while
24 performing my duties as the named plaintiff in this action. I have been committed throughout the
25 course of this litigation to vigorously prosecuting this case on behalf of myself and the other non-
26 exempt employees. I believe that I have demonstrated my ability to advocate for the interests of the
27 other non-exempt employees by initiating this lawsuit, providing documents to my attorneys
28 pertaining to my employment with Defendants, keeping in regular contact with my attorneys

1 regarding the status of the lawsuit, providing my attorneys with any information needed to continue
2 to prosecute this action, and reviewing the settlement and its terms to make sure it was fair.

3 8. I will continue to actively participate in this lawsuit as necessary, and will continue
4 to make myself available to assist in this case in the future as needed.

5
6 I declare under penalty of perjury under the laws of the State of California that the foregoing
7 is true and correct and that this declaration was executed on June 3, 2025 in California.

8 DocuSigned by:
9 

10 94D2F181BD51435...
11 Juan Manuel Gomez.