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Attorneys for Plaintiffs BRITTNI AGHEDO and
IEASHA PETERS, individually and on behalf of
others similarly situated, and JIMMY QUEVEDO,
individually, on behalf of others similarly situated
and aggrieved employees pursuant to the California
Private Attorneys General Act

(Additional Counsel on Following Page)

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

BRITTNI AGHEDO and IEASHA PETERS,
individually and on behalf of others similarly
situated, and JIMMY QUEVEDO, individually,
on behalf of others similarly situated and
aggrieved employees pursuant to the California
Private Attorneys General Act

Plaintiff,

vs.

VILLA ESPERANZA SERVICES, a California
501(c)(3) non-profit organization; and DOES 1
through 25, inclusive,

Defendants.

Case No. 23STCV27362

*Assigned for All Purposes to the Honorable
Carolyn B. Kuhl, Dept. SS-12*

**DECLARATION OF PLAINTIFF JIMMY
QUEVEDO IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: July 2, 2025

Time: 10:00 a.m.

Dept.: SS-12

Complaint Filed: November 6, 2023

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7 IEASHA PETERS, individually and on behalf of
others similarly situated, and JIMMY QUEVEDO,
8 individually, on behalf of others similarly situated
and aggrieved employees pursuant to the California
9 Private Attorneys General Act

DECLARATION OF JIMMY QUEVEDO

I, Jimmy Quevedo, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am one of the named plaintiffs in *Aghedo, et al. v. Villa Esperanza Services*. 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 am employed by Defendant Villa Esperanza Services (“Defendant”) as an hourly-paid, non-exempt “Instructional Aide” since approximately November 2022. During my employment with Defendant, I was subject to Defendant’s wage and hour policies and practices that are at issue in this case.

3. As an Instructional Aide, I was responsible for serving clients who suffer from intellectual and development disabilities. During my employment with Defendant, I was required to sign an on-duty meal period agreement and did not receive off-duty meal periods, and also was not able to take off-duty rest periods due to my responsibilities to my clients. As a result of these violations, I believe that I did not receive accurate and complete wage statements.

4. I have been actively involved in this case since I first retained Haines Law Group, APC (“HLG”) in early 2024. On February 21, 2024, I filed a class action complaint in the matter entitled, *Jimmy Quevedo v. Villa Esperanza Services*, Los Angeles County Superior Court Case No. 24STCV04374. Without waiving the attorney-client privilege, prior to filing this lawsuit, my attorneys explained my role and responsibilities as a Class Representative, and I understand my responsibilities as a Class Representative. Since retaining my attorneys, I have had many discussions with the attorneys and staff at HLG, including discussions regarding Defendant’s wage and hour practices and my claims in this case, potential witnesses, litigation strategy, updates on how the case was proceeding, the Settlement, and how I could help the case and potential Settlement Class members. I also gathered and reviewed documents for use in the lawsuit, reviewed relevant documents with my attorneys, and responded to written discovery requests from Defendant. I also spent time preparing for mediation with my attorneys as well as reviewing the Settlement Agreement in this case. I estimate that I have spent at least 30-35 hours on this case from the time I first spoke with my attorneys

1 regarding this case until the present. I also understand that as part of the Settlement, I have agreed to
2 a general release of claims against Defendant, which is broader than the release of claims agreed to by
3 other Settlement Class members.

4 5. When I filed my lawsuit, I understood that this lawsuit could benefit former and current
5 employees by helping to recover their unpaid wages, unpaid meal and rest period premiums, and other
6 penalties. I knew there was a risk that I could be liable for Defendant's costs if we lost the case. I
7 accepted this risk because I wanted Defendant to pay its current and former employees for their unpaid
8 wages and penalties. Even though I understood that filing a lawsuit is a public record, I accepted that
9 burden in order to help former, current, and future employees. As far as I am aware, I have no actual
10 or potential conflicts with any of the Settlement Class members.

11 6. I understand that my attorneys will request that the Court approve a Class
12 Representative Enhancement Payment of \$7,500.00 for my efforts on behalf of the Settlement Class.
13 I believe this amount is reasonable based on the amount of time and effort I have devoted to this case
14 and the risks I have undertaken as a class representative, and my general release of claims, as described
15 above. My support for the Settlement is not contingent on me receiving this enhancement payment.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing
17 is true and correct. Executed on Mar 4, 2025, at M, California.

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20 Jimmy Quevedo (Mar 4, 2025 16:42 PST)
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