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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

JESLYN BARRIOS, and KARINA ZAYAS,
individually, and on behalf of themselves and
other current and former employees,

Plaintiff,
v.

TRI-STATE COMMUNITY HEALTHCARE
CENTER, a California corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 24STC28332

[Assigned for all purposes to Hon. Samantha
P. Jessner, Dept. 7]

**DECLARATION OF PLAINTIFF JESLYN
BARRIOS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

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I, JESLYN BARRIOS, declare as follows:

1. I am an individual over the age of 18. I am a named plaintiff in the above entitled action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Tri-State Community Healthcare Center as a non-exempt employee from approximately May 2023 to August 2024.

3. Before talking to my lawyers at Yoon Law, I made many attempts to resolve my main complaint with Tri-State on my own. I tried to contact them several times without any result. Eventually, after about a month, I started researching my options, including researching my rights. If Tri-State had paid me my vacation like I thought, which was a weeks' worth, I probably never would have looked for an attorney.

4. After researching my options for two days, which took several hours, I started calling for attorneys and ultimately selected Yoon Law.

5. Before starting this lawsuit, I was informed of what my obligations as a class representative would be. I consented to the filing of this lawsuit knowing these obligations. Part of those obligations include that my experiences are similar to others. I believe I was not treated specially, that I was subject to the same policies and practices that deprived me of my wages as were others. By starting this lawsuit, I hoped that I might be able to change Tri-States policies to better protect the working conditions of my former coworkers, as well as receive back pay.

6. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees of Defendant.

7. I have been willing and have assisted my attorneys to win my case against Defendant. I have searched for documents relating to my employment as well as assisted in answering any questions my lawyers had throughout the case. I have been willing to set aside time to appear at trial in this case. I am and was able to support myself during this litigation. I spent about two hours in my initial calls with Yoon Law.

1 8. Based on my experience and knowledge Tri-State's policies and practices, I
2 worked with Yoon Law to bring claims on my own behalf as well as on behalf of other hourly-
3 paid, non-exempt employees. Specifically, I initiated this lawsuit because I was denied vacation
4 pay, and I thought there were other wage violations while working at Tri-State.

5 9. I retained Yoon Law, APC on a contingency fee basis. My attorneys are
6 advancing the costs of this litigation and that is my agreement with them and the only
7 agreement we have regarding costs.

8 10. I understood when I hired my lawyers that I agreed to be a named plaintiff to
9 lead what I hoped would become a class action lawsuit. I understood that because of this, I
10 would have to do more work than if I just sued for myself alone. I understood that trying to get
11 my case to be a class action was higher stakes for Tri-State than suing for just myself, and that
12 Tri-State was likely to fight my class action very differently than if I sued alone.

13 11. I was regularly kept up to date by my attorneys and kept myself up to date by
14 checking in with my attorneys about every other month. Each call took about half an hour on
15 average. Sometimes calls were brief, but sometimes calls were long, like when I needed to
16 understand some of the complexities of class actions, which of the things Defendant did were
17 actual claims I could sue for, my experience at Tri-State, and case strategy.

18 12. I also spent time looking for documents and reviewing documents and explaining
19 my documents to my attorneys. It took me about 2-3 hours to find and provide my documents. It
20 took more time to go over my situation and my documents with my counsels.

21 13. I attended the mediation in this case. I also was kept up to date on post-mediation
22 discussions on settlement. I spent time reading and understanding both the proposal, what a
23 proposal was, as well as the settlement agreement, talking with my lawyer about the papers and
24 making sure I understood and that it was fair to myself and the class.

25 14. I would estimate I spent well over 20 hours on the various tasks involved in this
26 case from the start. This excludes the time I spent thinking about and understanding the case.

27 15. I knew this case would be a public record. I have googled my own name and am
28 aware that the first entry is this lawsuit. I am proud of the results of this lawsuit, but I am also

1 aware that suing a prior employer is a burden that most people who will benefit from my action
2 will not have. I am a single mother paying child support. I am currently working and have been
3 during the time of this lawsuit. I am also in nursing school. All these other activities, being a
4 single mother, working and nursing school are things that I had to sacrifice as part of this
5 lawsuit. Not simply the time spent actively in this case, but the stress from being a plaintiff in an
6 public and active potential class action litigation is something that has been part of my life for
7 the past year, a very busy year juggling work, motherhood and schooling. These are activities
8 that I hope and expect will enrich my life in the future.

9 16. I do not expect that this lawsuit will enrich my life in the future. It is something I
10 did because I had little choice. I was unable to take action for my own relatively modest
11 vacation and wage claim, but I was able to find a good attorney to pursue a class action. I am
12 proud of the result from my action, but I also believe I have made a real sacrifice for others,
13 which no one other than me and the other plaintiff, Ms. Zayas, had to make.

14 17. I believe that I have done everything that my attorneys have asked of me and
15 believe I have done my best as a class representative to achieve as much as possible for as many
16 others as possible. I respectfully request that the Court award me an incentive payment of
17 \$15,000 for my active participation in this settlement of my class action case.

18 18. I am not related to anyone associated with Yoon Law, APC. My lawyers are
19 paying for the costs of this lawsuit, and that is the only agreement I have with them about costs.
20 Since we settled this case, I understand the costs are coming from the settlement, of which I am
21 paying my portion as a class member.

22 I declare under penalty of perjury under the laws of the State of California and the
23 United States of America that the foregoing is true and correct. Executed on this 4th day of
24 September 2025, at Palmdale, California.

25 
Jeslyn Barrios (Sep 4, 2025 13:10:29 PDT)

26 Jeslyn Barrios