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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF RIVERSIDE**

LONYAI CAMACHO, individually, and on behalf of other members of the general public similarly situated; and TERESA TURNER on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiffs,

v.

EYECARE SERVICES PARTNERS MANAGEMENT, LLC, a Delaware limited liability company; INLAND EYE SPECIALISTS, an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No. CVRI2203096

**DECLARATION OF TERESA TURNER IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT**

Date: May 15, 2026

Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp

Dept.: 1

1 I, Teresa Turner, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently  
3 testify to the following facts from my own personal knowledge. I am a named Plaintiff in the above  
4 wage and hour class and PAGA action filed against Eyecare Services Partners Management LLC  
5 (“Defendant Eyecare Services”) and Inland Eye Specialists, a Medical Corporation (“Defendant Inland  
6 Eye Specialists”) (collectively, “Defendants”).

7 2. This declaration is being submitted in support of Plaintiffs’ Motion for Preliminary  
8 Approval of Class Action and PAGA Settlement.

9 3. I believe that I am, have been and will continue to represent the interests of the PAGA  
10 Group Member fairly and adequately. I have claims that are typical of the claims of the PAGA Group  
11 Members that I am seeking to represent.

12 4. I worked for Defendants as a non-exempt employee from January 2005 to January 2021.  
13 At all times during my employment, I earned an hourly wage and was entitled to legally compliant meal  
14 and/or rest periods, and minimum, regular and overtime wages for all hours worked. Throughout my  
15 employment, I was subject to Defendants’ written policies and procedures.

16 5. Generally, my lawsuit claims that Defendants failed to provide compliant meal and rest  
17 periods, failed to pay for all time worked, failed to reimburse necessary business expenses, and failed  
18 to furnish accurate, itemized wage statements.

19 6. There is no conflict between my interests and the interests of the PAGA Group Members  
20 that I am seeking to represent. My interests are entirely coextensive with the interests of the PAGA  
21 Group Members. I allege that I was injured by the same company-wide policies and practices to which  
22 the PAGA Group Members were subjected and seek the same relief. I have already demonstrated my  
23 ability to advocate for the interests of the PAGA Group Members by initiating this litigation and  
24 evaluating the proposed settlement to assure that it is fair.

25 7. I understood at the time that I filed this action, that as a representative of the PAGA Group  
26 Members, I owed a duty to the PAGA Group Members to faithfully prosecute this action with their best  
27 interests at the forefront of every decision. I understood that I could not make any decision in this action  
28 for the sole benefit of my personal interest. I understood that in executing this duty, I might have been

1 asked to sacrifice my personal best interests for the benefit of the interests of the PAGA Group Member.  
2 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible  
3 relief for my former co-workers for what I perceived to be Defendants' unlawful wage and hour  
4 practices. I believe that I faithfully executed the duties of a PAGA Group Member representative  
5 throughout this litigation and will continue to do so until this litigation is fully and finally resolved.

6 8. I believe that the proposed settlement before the Court is fair, reasonable and adequate,  
7 and made in the best interest of the PAGA Group Members. Consequently, I respectfully, and humbly,  
8 ask the Court to grant preliminary approval of the Settlement and all of its terms.

9 9. I have not negotiated any settlement of individual claims with Defendants separate from  
10 the settlement at bar.

11 10. Once preliminary approval of the Settlement is granted, my counsel will file a formal  
12 motion for the negotiation of Plaintiff Incentive Awards. This motion will be accompanied by a further  
13 declaration from me that describes the services I performed to prosecute this action, includes an estimate  
14 of time I spent performing these services, the risks I assumed or benefits I received in prosecuting this  
15 action. This declaration will also identify any adverse consequences I suffered in prosecuting this  
16 action.

17 11. I am not a named plaintiff in any other PAGA case, pending or closed.

18 I declare under the penalty of perjury under the laws of the State of California that the foregoing  
19 is true and correct. Executed on 04/14/2026, at Menifee (Location/City), California.

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Teresa Turner (Apr 14, 2026 12:02:28 PDT)  
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