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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF ALAMEDA**

JALON STANLEY, as an individual and on  
behalf of all others similarly situated,  
  
Plaintiff,  
  
vs.

NORTH STAR EMERGENCY  
SERVICES INC.; and DOES 1 through  
50, inclusive,  
  
Defendants.

Case No.: 24CV082930

**DECLARATION OF ROMAN JONES IN  
SUPPORT OF PLAINTIFFS’ MOTION FOR  
PRELIMINARY APPROVAL OF CLASS AND  
REPRESENTATIVE ACTION SETTLEMENT**

Date: May 19, 2026  
Time: 2:30 P.M.  
Dept.: 21

**Reservation No.: 924738831245**

Action Filed: July 10, 2024  
Trial Date: None Set

**DECLARATION OF ROMAN JONES**

I, Roman Jones, hereby declare and state as follows:

1. I am the Plaintiff in the above-captioned action and have personal knowledge of all matters stated herein, and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement.

2. I believe the settlement is fair and reasonable and constitutes a fair resolution of the alleged claims.

3. During my employment with Defendant, several issues concerned me that I believed did not comply with California law, including failure to pay all overtime wages, failure to provide compliant meal periods and rest breaks, failure to pay all sick time, failure to timely pay wages; wage statement violations, waiting time penalties, failure to reimburse necessary business expenses; and unfair competition. Although I was uncertain whether to bring a lawsuit due to the risks of stepping forward, including potential harm to my career and future employment prospects, I retained my attorneys and agreed to pursue this case on a class action basis because I believed that both other employees and I were not being treated lawfully.

4. When I first retained my attorneys and chose to pursue this case on a class action basis, I understood that I had specific responsibilities as the Class Representative, including representing the interests of all class members, placing the interests of the class on par with or above my own, actively participating in the litigation including deposition, and remaining generally informed about the status and progress of the case. I also understood that any resolution of the action is subject to Court approval and must serve the best interests of the class as a whole.

5. I respectfully request that the court approve the Service Award for the following reasons.

6. First, I have spent a substantial amount of time working on this case and have performed significant services for the Class to help obtain a highly beneficial settlement for my fellow employees.

7. On or about December 3, 2024, a Class Representative Action Complaint was filed

1 in the Superior Court of California, Alameda County. Subsequently, the complaint was amended to  
2 include a cause of action under the Private Attorney General Act (“PAGA”) on behalf of myself,  
3 the State of California, and other similarly aggrieved employees.

4 8. On or about May 8, 2025, I agreed to join this case as a named Plaintiff.

5 9. I have spent a substantial number of hours engaging in activities to benefit the class.  
6 I have assisted my attorneys in numerous ways, including explaining and discussing the company’s  
7 practices and procedures, locating and analyzing company documents, and communicating with  
8 other class members. These efforts involved numerous meetings with Class Counsel, telephone  
9 conferences, letters, emails, and text messages. These efforts required me to devote time in the  
10 evenings, on weekends, and during work hours, and to repeatedly relive stressful workplace  
11 experiences to assist counsel in prosecuting the case.

12 10. I reviewed settlement agreements and other related documents and maintained  
13 communication with my lawyers throughout the settlement approval process.

14 11. Second, I respectfully request that the Court approve the agreed-upon Service Award  
15 because I agreed to set aside my interests and put the class's interests ahead of or on par with my  
16 own. In doing so and successfully bringing this case as a class action, I helped obtain a highly  
17 beneficial settlement for the class members.

18 12. Third, as a condition of this class action settlement, I was required to release and  
19 waive all possible individual claims against the company, including claims that were unique to me,  
20 a requirement that none of the other class members were subject to.

21 13. Fourth, by bringing this case as a class action, I undertook significant risks and  
22 stresses at a high emotional cost without any guarantee of success. For example, filing this lawsuit  
23 and being a whistleblower was stressful on a daily basis, as I constantly worried about the risk that  
24 this case could impact my ability to find future jobs. This stress and risk persisted throughout the  
25 entire case, and I’m concerned it may hinder my job prospects in the future, given that the case  
26 information is publicly available online.

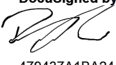
27 14. Fifth, bringing this case also involved financial risk because, if the case had been  
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unsuccessful, I faced the possibility that Defendant could seek to recover litigation costs, and I understood there was a risk of being exposed to additional financial burdens.

15. I affirm my unwavering dedication to representing the interests of the putative class. I voluntarily assumed considerable risks and expended considerable effort to secure a favorable outcome. I trust that the Court will duly consider my request for a Service Award in recognition of these contributions.

16. Recognition of these efforts through a reasonable Service Award also serves the important public policy of encouraging employees to step forward to enforce California labor laws on behalf of others

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 4/17/2026, at San Ramon, California.

DocuSigned by:  


479437A1DA24459...  
 Roman Jones

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