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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

YULISSA MEDINA, on behalf of herself
and “aggrieved” employees pursuant to
Labor Code section 2698, et seq.,

Plaintiff,

vs.

24 HOUR FITNESS USA, LLC., a
California limited liability company; and
DOES 1-10, inclusive.

Defendant.

Case No. 24CV089740

Assigned to Hon. Mark Fickes, Dept. 518

**DECLARATION OF YULISSA MEDINA IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND
PAGA REPRESENTATIVE ACTION
SETTLEMENT**

DATE: March 5, 2026

TIME: 2:30 p.m.

DEPT.: 518

Reservation ID: 233298411480

Action Filed: August 30, 2024

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15 Attorneys for Plaintiff Bruno Cruz

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17 I, YULISSA MEDINA, hereby declare and state as follows:

18 1. I am a named Plaintiff in this lawsuit against Defendant 24 HOUR FITNESS USA,
19 LLC ("Defendant") and I submit this declaration in support of Plaintiffs' Unopposed Motion for
20 Preliminary Approval of Class and Representative Action Settlement. I am a competent adult and
21 worked for Defendant as a non-exempt employee during the relevant time period. I have personal
22 knowledge of the facts set forth herein, and if called as a witness to testify to them, I could and
23 would do so competently.

24 2. I contacted my current attorneys when I questioned the employment practices of
25 Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class
26 Representative in a class action on behalf of other employees of Defendant whom I believed were
27 being subjected to labor law violations in addition to asserting individual wage, hour, and
28 termination-related claims.

1 3. Specifically, I questioned Defendant's policies of failing to provide legally
2 compliant meal and rest periods, failing to timely compensate employees upon separation, and
3 failing to issue their employees deficient wage statements. Through many discussions with my
4 lawyer, I learned these may be illegal practices and Defendant's employees might have recourse
5 for them.

6 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
7 class ahead of my own. I understood that I could possibly earn a small enhancement payment if
8 this case resolved itself favorably, but always knew that I could also be responsible for paying
9 Defendant's attorneys' fees and costs if it did not. My goal in bringing this lawsuit was to obtain
10 a recovery on behalf of myself and the class, and even more importantly, to put an end to what I
11 believed were illegal practices on the part of Defendant. I believe I have achieved both through
12 this lawsuit and settlement.

13 5. I am very happy about the results of this litigation. I am satisfied that Defendant is
14 compensating class members for damages, penalties, and interest that I believe we are due.

15 6. At the onset of this case, I spent time through numerous phone calls with my attorney
16 explaining what I understood to be the policies and procedures of Defendant and how they were
17 applied to me and others I worked with. During the course of this litigation, up through and
18 following the settlement process, I kept actively involved with its status, tracking the status of the
19 case and participating as much as possible.

20 7. While I have not maintained detailed time records of my activities in connection
21 with this litigation, I believe that have spent and will spend a total of approximately 20 hours
22 assisting my attorney with the preparation of this case, and doing work and analysis independent
23 from my attorney both before and during this case, including conducting an independent
24 investigation of the facts.

25 8. Before this litigation commenced, and throughout its course, I have spent
26 approximately 10 or more hours gathering, organizing, and reviewing documents and information
27
28

1 for this lawsuit. I sifted through many of my own documents and reviewed information produced
2 by Defendant as part of this case.

3 9. I have communicated with my attorney several times per month to track my case's
4 status. I have taken an active involvement in this matter throughout its course.

5 10. This lawsuit will almost certainly result in reputational harm to me. There is a stigma
6 associated with suing anyone, let alone your former employer. I will probably be adversely
7 affected when it comes to obtaining future employment—employers who learn that I sued
8 Defendant in a class action will likely avoid hiring me.

9 11. I do not believe that I have any conflicts with other members of the class. My
10 interests in bringing this lawsuit—for Defendant to change their labor practices going forward and
11 to compensate current and former employees—are the same as those of all other class members.

12 I declare, under penalty of perjury, under the laws of the State of California that the
13 foregoing is true and correct.

14 Executed on 02 / 04 / 2026 at Bay Point, California.

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17 YULISSA MEDINA