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16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **FOR THE COUNTY OF ALAMEDA**

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

21 Plaintiff,

22 vs.

23 24 HOUR FITNESS USA, LLC., a California
24 limited liability company; and DOES 1-10,
25 inclusive.

26 Defendants.

Case No. 24CV089740

Assigned to Hon. Mark Fickes, Dept. 518

CLASS ACTION

**DECLARATION OF YULISSA MEDINA
IN SUPPORT OF UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
UNOPPOSED APPLICATION FOR
APPROVAL OF ATTORNEYS’ FEES
AND COSTS, CLAIMS
ADMINISTRATION FEES, AND CLASS
REPRESENTATIVES’ SERVICE
PAYMENTS**

DATE: July 23, 2026

TIME: 2:30 p.m.

DEPT.: 518

Reservation ID: 238179068951

Action Filed: August 30, 2024

DECLARATION OF YULISSA MEDINA IN SUPPORT OF UNOPPOSED MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND UNOPPOSED APPLICATION FOR APPROVAL OF ATTORNEYS’ FEES AND
COSTS, CLAIMS ADMINISTRATION FEES, AND CLASS REPRESENTATIVES’ SERVICE PAYMENTS

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

2 1. I am a named Plaintiff in this lawsuit against 24 Hor Fitness USA, LLC
3 (“Defendant”) and I submit this declaration in support of Plaintiff’s Unopposed Motion
4 for Final Approval of Class Action Settlement and Plaintiff’s Unopposed Application
5 for Attorneys’ Fees and Costs, Claims Administration Fees, and Class Representative’s
6 Enhancement Payment. I am a competent adult and worked for Defendant as a non-
7 exempt employee during the Class Period. I have personal knowledge of the facts set
8 forth herein, and if called as a witness to testify to them, I could and would do so
9 competently.

10 2. I contacted my current attorneys when I questioned the employment
11 practices of Defendant prior to commencing this lawsuit. I accepted the opportunity to
12 act as the Class Representative in a class action on behalf of other employees of
13 Defendant who I believed were being subjected to labor law violations. Although
14 presented with the opportunity, I did not pursue this case on an individual basis and
15 instead did so as a class action so that I could help other employees recover for what I
16 believed were Defendant’s illegal practices.

17 3. Specifically, I questioned Defendant’s policies of failing to pay all
18 minimum and overtime wages, pay wages at the correct rates of pay, provide legally
19 compliant meal and rest periods, pay all due upon separation of employment and failing
20 to provide accurate and complete wage statements. Through many discussions with my
21 lawyers, I learned these may be illegal practices and Defendant’s employees might have
22 recourse for them.

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

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

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

12 7. While I have not maintained detailed time records of my activities in
13 connection with this litigation, I believe that have spent a total of approximately 25
14 hours assisting my attorney with the preparation of this case, and doing work and
15 analysis independent from my attorney both before and during this case, including
16 conducting an independent investigation of the facts.

17 8. Before this litigation commenced, and throughout its course, I have spent
18 approximately 10 or more hours gathering, organizing, and reviewing documents and
19 information for this lawsuit. I sifted through many of my own documents and reviewed
20 information produced by Defendants as part of this case.

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

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

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

5 12. The requested \$20,000 service payment is further warranted because,
6 unlike absent Class Members, I am providing Defendant with a general release of all
7 known and unknown claims. I possessed valuable individual claims for wrongful
8 termination and retaliation that extended beyond the class claims asserted in this action.
9 Specifically, I experienced retaliation for reporting missed meal and rest periods, was
10 accused of time fraud when I tried to fix my timecard pursuant to Defendant's direction,
11 and otherwise penalized for using paid time off when I was sick. I was ultimately
12 terminated from my employment as a result of these complaints and issues, which I feel
13 was wrongful and justifies the increased service payment. By releasing those claims as
14 part of the settlement, I am conferring an additional benefit on Defendant that is not
15 being provided by other Class Members. The requested service payment reasonably
16 compensates me for that additional consideration and these valuable claims.

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

19 Executed on 06 / 26 / 2026 at Bay Point, California.

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