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Attorneys for Plaintiffs
AARON CLAYTON WILSON and
NATHANIEL GARCIA CLAUDIO

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

AARON CLAYTON WILSON AND
NATHANIEL GARCIA CLAUDIO,
individually, and on their own behalf and on
behalf of all others similarly situated,

Plaintiffs,

vs.

PEOPLE ASSISTING THE HOMELESS, a
California non-profit corporation; and DOES 1
through 100, inclusive,

Defendants.

CASE NO.: 24STCV17152

**DECLARATION OF PLAINTIFF
NATHANIEL GARCIA CLAUDIO IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Judge: Hon. Elaine Lu
Date: February 10, 2025
Time: 08:30 AM
Dept.: 9

Complaint Filed: July 10, 2024

DECLARATION OF NATHANIEL GARCIA CLAUDIO

I, Nathaniel Garcia Claudio, hereby declare:

1. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I am one of the named Plaintiffs in this action. On or around July 7, 2024, the Class Action Complaint entitled *Wilson v. People Assisting the Homeless*, was filed in the Superior Court of California, Los Angeles County, on behalf of Plaintiff Wilson, and all others similarly situated. On or about November 24, 2024, Plaintiff Wilson and myself filed a First Amended Class Action adding myself as a Plaintiff and a claim for civil penalties pursuant to PAGA.

3. I was employed by Defendant PATH. ("Defendant") as a non-exempt hourly employee Case Manager 3 from June 13, 2022 through April 11, 2024.

4. In my Case Manager 3 capacity for Defendant they failed to pay me overtime and minimum wages. Further, Defendant also failed to afford me compliant meal/rest breaks.

5. I understand that, as a Class Representative, I have a duty to look out for and protect the interests of the Class as a whole. I do not believe, nor do I have any reason to believe, that my interests in this lawsuit are in conflict or in any way antagonistic to the interests of those of my fellow Class Members.

6. As one of the named Plaintiffs in this action, I provided significant assistance to Plaintiffs' Counsel in this case. I spent approximately 30 hours relating to this case. Among other things, I participated in several lengthy interviews and phone conferences over a period lasting several months, searched for and produced a significant number of relevant documents, reviewed pleadings in the case, reviewed documents and data provided by Defendants, kept in contact with my attorneys regarding the status of the case, and remotely attended the all-day mediation on May 6, 2025. My efforts were instrumental in securing the favorable terms of the Settlement Agreement, which will provide monetary compensation to a Class of approximately 960 Class Members.

7. In addition, this case also involved risks for me, such as the risk of having to pay Defendant's costs if we lost. Disregarding these risks, I pursued this case on behalf of the Class to a

successful resolution and settlement.

8. It is my understanding that based upon my industrious efforts as one of the Named Plaintiffs in this action there is something called a Class Representative Service Payment. I respectfully request that the Court grant this award to me in the amount of \$7,500 in addition to my pro rata share of the settlement fund.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on 12/04/2025 (date) in Long Beach (city), California.



Natasha Marie Garcia (Dec 4, 2025 08:25:59 PST)

Nathaniel Garcia Claudio