

Kevin A. Lipeles (Bar No. 244275)
kevin@kallaw.com
Thomas H. Schelly (Bar No. 217285)
thomas@kallaw.com
LIPELES LAW GROUP, APC
880 Apollo Street, Suite 336
El Segundo, CA 90245
Telephone: (310) 322-2211
Facsimile: (310) 322-2252

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 AARON
CLAYTON WILSON 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 AARON CLAYTON WILSON

I, Aaron Clayton Wilson, 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 myself, and all others similarly situated. On or about November 24, 2024, Plaintiff Claudio and myself filed a First Amended Class Action (“FAC”) adding Nathaniel Garcia Claudio 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 ICMS Case Manager from July 1, 2022 and beginning in September 2023, as a Lead ICMS Case Manager and continuing to November 7, 2023.

4. In my ICMS Case Manager/Lead ICMS Case Manager capacities for Defendant they failed to pay me overtime and minimum wages due. Further, Defendants 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 interest 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. Since this lawsuit was filed, I communicated frequently with my attorneys. In order for me to provide factual background for the Class Action Complaint and FAC, it was necessary for me to recall events from my former employment with Defendant, participate in multiple initial intake interviews, produce employment documents and be available for follow up calls, emails, and text messages from my attorneys. Throughout the course of this litigation, I participated in several phone calls with my attorneys plus numerous text message and email

exchanges, in order to provide such information.

7. My attorneys also requested that I provide them with paystubs and other personnel file documents in my possession documenting my time working for Defendant. Prior to becoming involved in this litigation, it was not my normal habit to keep every single paystub I received, and for the ones that I did keep, I was not sure where they were. It took me several hours over the span of a couple of days to locate all the paystubs and other documents requested by my attorneys which were in my possession.

8. Once the Class Action Complaint and FAC were drafted, my attorneys had me review the allegations for accuracy. At times, I would have questions, and would need to set up a call to have my questions answered as part of the review process. This involved phone calls with my attorneys as well as responding to emails and text messages to provide clarifying information to assist with revisions of the pleadings. This took several hours of my time. I had several such telephone conversations with my attorneys that lasted more than one hour each time.

9. My attorneys also had me review other documents which were either filed with the Court or necessary to litigate and eventually settle this matter. These included the other pleadings filed with the Court, the PAGA Letter to the Labor and Workforce Development Agency, the Mediation Brief, and the Settlement Agreement. This process required me to review these documents and confer with my attorneys about the accuracy of allegations and gave me an opportunity to ask questions and clarify my understanding of these documents, which was time consuming.

10. Moreover, I attended the mediation remotely for this matter on May 6, 2025.

11. My attorneys spent additional time with me on the phone answering my questions. I estimate that I have spent as many as 35 total hours working with my attorneys on this case.

12. 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.

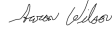
13. In addition, this case also involved risks for me, such as the risk of having to pay

Defendant's costs if we lost. Disregarding these risks, I pursued this case on behalf of the Class to a successful resolution and settlement.

14. 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 12/4/2025 (city), California.



Aaron Clayton Wilson