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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

JAMES HERNANDEZ, an individual, on behalf
of himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

VERIZON CORPORATE SERVICES GROUP
INC., a Corporation; VERIZON CORPORATE
RESOURCES GROUP LLC, a Limited Liability
Company; and Does 1 through 50, Inclusive,

Defendants.

Case No. 24STCV20608

**DECLARATION JAMES
HERNANDEZ IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS
SETTLEMENT**

Hearing Date: January 2, 2026

Hearing Time: 9:00 a.m.

Judge: Hon. Elihu M. Berle

Dept: SS-6

Complaint Filed: August 15, 2024

Trial Date: Not Set

1 I, James Hernandez, declare as follows:

2 1. I am over the age of eighteen, a Plaintiff and a proposed Class Representative in the
3 above-entitled matter. I submit this declaration in support of the Motion for Preliminary
4 Approval of Class Settlement and in support of my application for a Class Representative
5 Service Payment.
6

7 2. I have personal knowledge of all the facts stated herein. I could and would competently
8 testify under oath to these facts in court if requested to do so.

9 3. During the class period I worked as a Business Development Representative for
10 Defendants Verizon Corporate Services Group, Inc. and Verizon Corporate Resources Group
11 LLC ("Defendants" or "Verizon") in California and during that time period, I was classified by
12 Verizon as a non-exempt employee.
13

14 4. I retained my attorneys who are experienced in both class action and PAGA
15 representative action litigation and claims against employers for violations of the California
16 Labor Code. I have no personal relationship or family ties to my attorneys or any officer of the
17 Court. I am not aware of having any actual or potential conflicts of interest with another class
18 member in this case nor am I aware of having any actual or potential conflicts of interest with
19 Apex Class Action, LLC, the settlement administrator. I am not aware of any other pending
20 matter or action asserting claims that will be extinguished or adversely affected by this
21 settlement.
22

23 5. I decided to pursue this class action lawsuit and be a plaintiff/class representative because
24 I felt that my legal rights as an employee and others like me were violated. For example, I
25 received non-discretionary compensation from time to time, such as bonuses, but these payments
26 during certain pay periods when I worked overtime were not factored into my regular rate. I was
27

1 underpaid sick pay and overtime as a result. As another example, I often did not receive
2 compliant meal and rest breaks which were late, interrupted or missed entirely. I also did not
3 receive all the meal and rest break premiums I was entitled to and when I did receive premium
4 payments they were often an incorrect amount. Additionally, I was required to use my personal
5 cellular phone for company business without all reimbursements by Verizon. I was also required
6 to work off the clock at times, after hours for example, but I was not paid any wages for this time
7 I worked for the company.
8

9 6. I spoke to my attorneys several times and discussed how Verizon implemented its
10 company policies and procedures. I also assisted my attorneys in their investigation into my
11 claims by providing them documents and answering their questions. I reviewed the complaint
12 before it was filed and after it was filed I was given access to an electronic file sharing program
13 that alerted me via email when important documents were filed so that I could review them and
14 keep up with the developments in the case which I understood was one of my duties as a class
15 representative. I was in contact with my attorneys to answer questions and I would also contact
16 my attorneys from time to time if I had any questions about the case.
17

18 7. Even though this action is in the process of settling, I was and remain prepared to
19 perform all the duties of a class representative. I understand that as a class representative I have
20 assumed a fiduciary responsibility to prosecute this class action on behalf of the absent class
21 members. I have understood that as a fiduciary, I have a duty to prosecute this action for the
22 benefit of the class members and surrender any right to compromise the group action for an
23 individual gain.
24

25 8. I understood that being a plaintiff/class representative in this case meant that I was
26 seeking damages not only for myself but also other current and/or former non-exempt employees
27

1 working for Verizon in California who make up the class. I felt that these individuals were not
2 aware of their labor law rights and even if they were they would probably be apprehensive about
3 speaking up or even simply because of the time, effort and risk involved in filing a class action
4 lawsuit.

5
6 9. I understood that being a part of this lawsuit involved risks. For example, my attorneys
7 explained to me that if the case went to trial and we lost, I could be held responsible to pay for all
8 or part of the attorney fees and costs paid by Verizon to defend this lawsuit. Also, I knew there
9 was a risk that future employers, if they ever find out about this lawsuit, could hold it against me
10 or downgrade me as a potential hire. As the only named Plaintiff in this case it would not be
11 difficult for a future employer to become aware that I sued my employer for labor law violations.
12 Ultimately, I decided these risks were worth it and decided to fight for my rights and the rights of
13 others regardless of the risks, time and effort I spent on this case.
14

15 10. During the lawsuit I stayed in touch with my attorneys by phone and email. I also kept up
16 to date on important developments by reviewing court filings that were made available to me
17 electronically as I described above.

18 11. A mediation took place on July 25, 2025 with Monique Ngo-Bonnicci, a well-respected
19 and experienced mediator of wage and hour class actions. After the mediation the parties were
20 able to reach an agreement to settle the action. I communicated with my attorneys regarding the
21 terms of the settlement which was reached between the parties and understood that I was
22 representing absent class members and therefore wanted the best possible result to be obtained
23 for the class members and I believe a very positive result was in fact achieved via settlement. I
24 reviewed and signed the Memorandum of Understanding on August 8, 2025, and when the final
25 settlement papers were ready, I closely reviewed the Class Action and PAGA Action Settlement
26
27

1 Agreement, which I signed on November 13, 2025.

2 12. I have been actively involved with this lawsuit performing the duties described above.
3 Although I did not keep time records, I was in regular contact with my attorneys, reviewed court
4 filings, and spent a significant amount of time on the issues presented during the lawsuit and in
5 the settlement process. I estimate that I spent approximately 40-50 hours working on this case
6 up until this point. I believe I have been diligent and have done what is expected of a named
7 plaintiff and a proposed class representative to date and will continue to do so. I have and always
8 will maintain the best interest of the class members.
9

10 13. My attorneys explained to me that the settlement process involves a two-step review by
11 the Court to determine whether the settlement is fair before approving the settlement. I know
12 this process also involves notifying all class members of the settlement terms and of their rights
13 to make a claim for their settlement share, to opt out of the settlement or to object to the
14 settlement.
15

16 14. I believe I did the right thing by filing this case on behalf of the class members who,
17 subject to court approval, are in line to receive monetary payments as a result of this case and
18 settlement. This is money they may never have ever gotten if I did not pursue this action on their
19 behalf. I feel significant personal satisfaction to know that I played a role in the class members
20 being entitled to monetary payments as a result of the filing of this lawsuit. I also believe that
21 the requested Class Representative Service Payment of \$10,000 from the settlement is fair
22 compensation for the work I performed and the risks I undertook.
23

24 15. In light of all the time and effort I have spent on this case, the risk I undertook by suing
25 my employer, the exposure to being responsible for paying Verizon's costs in the event we did
26 not win the case, the reputational risk that future employers may hold this lawsuit against me,
27

1 and in light of the size of the settlement, I believe the request for \$10,000 as a Class
2 Representative service payment is fair and reasonable.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct.
5

6 Executed on 11/13/2025, at Inglewood, CA
7 (city, state)

8 
9 James Hernandez (Nov 13, 2025 11:29:18 PST)

James Hernandez