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**Attorneys for Plaintiff Tiffany Soliman, Maria Carralez,
Eugene Bautista and the Putative Class**

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

TIFFANY SOLIMAN, MARIA CARRALEZ,
and EUGENE BAUTISTA, on behalf of
themselves and all other similarly situated,

Plaintiff,

vs.

SATELLITE HEALTHCARE, INC.; and
DOES 1-100, inclusive,

Defendants.

Case No. 21CV38721

DECLARATION OF EUGENE BAUTISTA

I, Eugene Bautista, declare:

1. I am one of the named Plaintiffs and class representatives in this action.
2. I have personal knowledge of the matters set forth herein and, if called upon to do so, could and would competently testify thereto under oath.

3. I was employed by Defendant Satellite Healthcare, Inc. (“Satellite”) from approximately late 2019 through late 2022.

4. I am and have been readily familiar with and understand the claims asserted both on my behalf and on behalf of the other class members in this case. I understand that the claims asserted are based on: 1) Satellite’s alleged failure to pay me and the other Class Members minimum wage and overtime; 2) S Satellite’s alleged failure to pay me and the other Class Members overtime, meal/rest break premiums, and sick pay at our regular rate of pay (accounting for shift differentials and premiums); 3) Satellite’s alleged failure to provide me and the other Class Members with compliant meal and rest breaks; 4) Satellite’s alleged failure to provide accurate itemized wage statements; 5) Satellite’s alleged failure to timely pay me and the other Class Members all wages; and 6) Satellite’s alleged failure to reimburse me and the other Class Members for business expenses such as use of our personal cell phones.

5. Throughout this case, I have understood and appreciated my role and responsibilities as a class representative. I have understood that it is my responsibility to look out for the best interests of all class members and to not put my own interests ahead of theirs. I have willingly and knowingly accepted these responsibilities and have carried them out to the best of my ability.

6. In January 2023, I retained Mayall Hurley, P.C. to represent myself and the Class in claims against Satellite. It is my understanding that Mayall Hurley, P.C. is experienced in litigating wage and hour class actions against employers like Satellite.

7. By deciding to file the lawsuit as a class action, I agreed to pursue not only my own potential wage and hour claims, but also the claims of all similarly situated employees. In so doing, I agreed to put the interests of the class ahead of my own. I also agreed to participate actively in the lawsuit and to assume the risks of serving as a named Plaintiff and class representative.

8. Since hiring Mayall Hurley, P.C., I have been in regular contact and participated closely with my attorneys in the litigation of this class action. I have spent considerable time helping the Class of employees I seek to represent win compensation from Satellite. The tasks I have been actively involved in included, but are not limited to:

- a. Interviewing and selecting Class Counsel;
- b. Providing documents to Class Counsel relevant to their investigation of the claims at issue in this lawsuit;
- c. Providing statements to Class Counsel to assist them in understanding the nature of the Class' claims and to assist them in assessing potential damages;
- d. Assisting in the preparation of the class action complaint and amendments thereto;
- e. Reviewing documents produced by Satellite with Class Counsel to assist them in understanding Satellite's policies, practices and procedures and how they were implemented on a day-to-day basis;
- f. Preparing for and participating in the Parties' mediation;
- g. Discussing the Mediator's proposal with Class Counsel;
- h. Participating in the protracted settlement negotiations that occurred after the mediation; and
- i. Following up with Class Counsel on a regular basis to check in regarding the status of the case and whether anything further was need of me.

9. Overall, I estimate that I have spent more than 30 hours of my time helping advance this case on behalf the Class.

10. As a named plaintiff and class representative, I have exposed myself to the negative reputational consequences of my name being tied to a class action lawsuit against my former employer.

11. Additionally, had this case not settled and were I not to ultimately prevail in this lawsuit, I understand that they case could have continued for years and that, if I lost, I could potentially have been responsible for some of Satellite's litigation costs, which could have been very extensive.

12. Despite these risks, I have served and remain willing to continue to serve in the role of class representative throughout the remainder of this litigation.

I declare under penalty of perjury under the laws of the State of California and the United

1 States of America that the foregoing is true and correct. Executed on 12/9/2024,
2 Stockton
3 in _____, California.
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Signed by:



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