

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA**

ANGELICA CUIEL, individually, and on
behalf of other members of the general
public similarly situated; ANGELICA
CUIEL, individually, and on behalf of
other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;
KIRA CHAMBERS, individually, and on
behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;
CHRISTINA ROMAY, individually, and on
behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

BASS MEDICAL GROUP, a corporation;
and DOES 1 through 100, inclusive; BASS
PRIVIA MANAGEMENT COMPANY OF
CALIFORNIA f/k/a. BASS
MANAGEMENT SERVICES
ORGANIZATION, LLC, a
California Limited Liability Company;
PRIVIA HEALTH GROUP, INC., a
Delaware Corporation

Defendants.

Case No.: MSC21-01668
Honorable Edward G. Weil

CLASS ACTION

**DECLARATION OF ANGELICA
CUIEL IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date:	_____
Time:	_____
Department:	39
Complaint Filed:	August 4, 2021
FAC Filed:	April 15, 2024
Trial Date:	None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I, **Angelica Curiel**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Bass Medical Group, Inc., Bass Privia Management Company of California, and/or Privia Health Group, Inc. (collectively, “Defendants”) as an hourly-paid Lab Assistant from April 2019 to approximately August 2019. I decided to seek legal advice about my work experience with Defendants. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **8 hours** discussing my situation, complex wage-and-hour class actions and what it meant to be a named plaintiff and class representative.

3. I have spent over **16 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly-paid and non-exempt Lab Assistant and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and any additional information that I had obtained.

4. Throughout the case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to

1 them as quickly as possible and gave them as much information and identified as many
2 documents as I could. I spent at least **10 additional hours** speaking with my attorneys about the
3 case, identifying potential witnesses, providing my attorneys with documents and information
4 concerning the case, and describing policies, practices, and procedures of Defendants.

5 5. As far as the settlement is concerned, I spent about **3 hours** reviewing the
6 settlement agreement and about **2 hours** asking questions and discussing the potential settlement
7 with my attorneys before signing the settlement agreement.

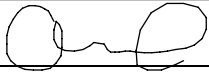
8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts helped to get the result obtained in this case, and
11 as a class representative, I respectfully request that the Court award me a Class Representative
12 Enhancement Payment in the amount of \$12,500.00 for my active participation in this case.
13 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
14 reasonable.

15 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this case. The only compensation I will receive is whatever amount
18 the Court awards as an enhancement payment, as well as my share of the settlement as a class
19 member and as an aggrieved employee.

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct.

22 Executed on this day 06/07/2024, at Oakland, California.

23 Electronically Signed  2024-06-07 04:40:43 UTC -24 6.2.155
Nintex AssureSign® b670e768-d415-450e-948e-b18701425cd5

24 Angelica Curiel