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[Additional counsel on next page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF CONTRA COSTA

ANGELICA CURIEL, individually, and on behalf of other members of the general public similarly situated; TERESA AVILA, 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;

Plaintiffs,

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,

Defendant.

Case No. MSC21-01668

DECLARATION OF KIRA CHAMBERS IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT

Date:

Time:

Judge: Hon. Edward G. Weil

Dept.: 39

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Attorney for Plaintiffs ANGELICA CURIEL and TERESA AVILA

1 I, KIRA CHAMBERS, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above
4 wage and hour class action filed against BASS MEDICAL GROUP, BASS PRIVIA MANAGEMENT
5 COMPANY OF CALIFORNIA f/k/a. BASS MANAGEMENT SERVICES ORGANIZATION, LLC,
6 and PRIVIA HEALTH GROUP, INC. (hereinafter “Defendants”).

7 2. This declaration is being submitted in support of Plaintiff’s motion for Preliminary
8 Approval of Class and PAGA Action Settlement.

9 3. I believe that I am, have been, and will continue to represent the interests of the class
10 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
11 to represent.

12 4. I worked for Defendants as a Massage Therapist in California from 2018 to February of
13 2022 and was at all times during my employment misclassified by Defendants as an independent
14 contractor. At all times during my employment, I was entitled to wages for all hours worked, legally
15 compliant meal and rest periods, and legally compliant wage statements as a result of my
16 misclassification. Throughout my employment, I was subject to Defendants’ written policies and
17 procedures.

18 5. Generally, my lawsuit claims that Defendants misclassified Massage Therapists, like
19 myself, as independent contractors.

20 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
21 to represent because I was subject to the same alleged unlawful employment policies and practices at
22 issue in this action, including but not limited to, Defendants’ failure to provide compliant meal and
23 rest periods, failure to pay for all hours worked, and failure to pay all wages when due. Factually,
24 Defendants’ policies and practices apply class wide, and Defendants’ liability can be determined by
25 facts common to all members of the Class.

26 7. Further, there is no conflict between my interests and the interests of the class that I am
27 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that

1 I was injured by the same company-wide policies and practices to which the proposed Class was
2 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
3 of the Class by initiating this litigation, undertaking class discovery, and evaluating the proposed
4 settlement to assure that it is fair.

5 8. I understood that at the time I filed this action, as a Class Representative, I owed a duty
6 to the putative class members to faithfully prosecute this action with their best interests at the forefront
7 of every decision. I understood that I could not make any decision in this action for the sole benefit
8 of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice
9 my personal best interests for the benefit of the interests of the putative class members. Nevertheless,
10 I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my
11 former co-workers for what I perceived to be Defendants' unlawful wage and hour practices. I believe
12 that I faithfully executed the duties of a Class Representative throughout this litigation and will
13 continue to do until this litigation is fully and finally resolved.

14 9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
15 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
16 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

17 I declare under the penalty of perjury under the laws of the State of California that the foregoing
18 is true and correct. Executed 06/07/2024, at Oakley, California

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20 By:  Kira Chambers (Jun 7, 2024 10:26 PDT)
21 KIRA CHAMBERS
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