

WOODALL LAW OFFICES
100 PINE STREET, SUITE 1250
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE: (415) 413-4629
FACSIMILE: (866) 937-4109
KEVIN@KWOODALLLAW.COM

KEVIN F. WOODALL, BAR NO. 180650

ATTORNEYS FOR PLAINTIFF, IVANA LEBRON

SUPERIOR COURT OF CALIFORNIA
COUNTY OF CONTRA COSTA
UNLIMITED JURISDICTION

IVANA LEBRON,

PLAINTIFF,

V.

SYCAMORE HEALTHCARE
ASSOCIATES, A CALIFORNIA
CORPORATION, AND DOES 1 THROUGH 10,
INCLUSIVE,

DEFENDANTS.

) CASE No. C20-00981

)
) **DECLARATION OF IVANA LEBRON**
) **IN SUPPORT OF UNOPPOSED**
) **MOTION FOR APPROVAL OF PAGA**
) **SETTLEMENT**

)
) DATE:
) TIME:
) DEPT: 21
) JUDGE: Hon. Jill C. Fannin

1 I, Ivana Lebron, declare and state as follows:

2 1. I am the Plaintiff in the above-captioned matter. I was employed by Sycamore
3 Healthcare Associates ("Sycamore") in 2019 and 2020, until my employment ended in
4 March, 2020. Except as otherwise indicated, I have personal knowledge of the facts set
5 forth in this declaration.

6 2. During my employment at Sycamore, I was paid by the shift instead of the defined
7 workday or workweek. As a result, some of my wage statements were inaccurate, in
8 terms of the hours worked at each rate of pay and hours worked in the stated pay period.
9 In addition, this practice of Sycamore resulted in some pay periods where I was not paid
10 all overtime wages and the unpaid overtime wages were not paid when my employment
11 ended.

12 3. While employed at Sycamore, I reported to work on at least one occasion and
13 worked less than one hour, yet Sycamore did not pay me at least two hours or half my
14 shift.

15 4. On some occasions, I did not receive a 10-minute rest period for every four hours
16 of work because my workload was too heavy. Additionally, I missed some 30-minute,
17 uninterrupted meal periods due to the heavy workload at Sycamore.

18 I declare under penalty of perjury of the laws of California and the United States
19 that this statement is true and correct to the best of my knowledge. Executed this
20 5th day of November, 2020, at Pimole, California.

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22 
23 IVANA LEBRON
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