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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

MENCHILA VILLARUBIA WOODALL,
as an individual and on behalf of all others
similarly situated,

Plaintiffs,

vs.

VASONA MANAGEMENT, INC., an
California corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 20CV366143

(Assigned to the Honorable Patricia M. Lucas,
Dept. 3)

**DECLARATION OF MENCHILA
VILLARUBIA WOODALL SUPPORT OF
PLAINTIFF'S MOTION TO APPROVE
SETTLEMENT AGREEMENT PURSUANT
TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: September 1, 2021

Time: 1:30 p.m.

Dept.: 3

Complaint Filed: April 20, 2020

FAC Filed: July 16, 2020

1 **DECLARATION OF MENCHILA VILLARUBIA WOODALL**

2 I, Menchila Villarubia Woodall, declare as follows:

3 1. I am an individual over the age of 18. I am the named Plaintiff in the above-
4 referenced action. I have personal knowledge of the facts set forth below and if called to testify I
5 could and would do so competently.

6 2. I was hired by Defendant Vasona Management, Inc. ("Defendant") as an on-site
7 manager from about 2004 to about December 31, 2019. I worked as an hourly, non-exempt
8 employee.

9 3. During my employment, whenever I was paid overtime and/or doubletime wages,
10 the wage statements Defendant provided did not identify the correct hourly rate of pay and/or
11 number of hours worked.

12 4. I understand that the claims alleged in this action were brought on behalf of other
13 aggrieved employees. I do not believe I have any interests that are adverse to the other
14 employees that are part of the PAGA settlement.

15 5. I have spent a significant amount of time discussing this matter with my attorneys
16 on many occasions and explaining my understanding of the Defendant's company practices. I
17 met with my attorneys to discuss this case and the facts involved, review the complaints filed,
18 respond to questions, and provide documents. In total I have spent roughly 25 hours gathering
19 documents related to this case, reviewing documents to be filed in this matter, and
20 communicating with my attorneys.

21 6. I have also entered into a general release of all known and unknown claims
22 against Defendant in entering into this settlement.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on
March 27, 2021, at Santa Nella, California.

DocuSigned by:
Menchila Woodall
1800-451-1000
Menchila Villarubia Woodall