

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Annabel Blanchard (SBN 258135)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF YOLO

IGNACIO PEREZ, and LISZANDRA
PADILLA, individually, and on behalf of other
members of the general public similarly
situated; and KAREN RIOS, 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,

v.

COMMUNICARE HEALTH CENTER., a
California Corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. CV-2019-469

Honorable Daniel M. Wolk
Department 9

CLASS ACTION

**DECLARATION OF LISZANDRA
PADILLA IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Annabel Blanchard); Declarations
of Proposed Class Representatives (Ignacio
Perez and Karen Rios) and [Proposed] Order
filed concurrently herewith]

Complaint Filed:	March 7, 2019
FAC Filed:	June 4, 2019
SAC Filed:	September 5, 2019
TAC Filed:	December 12, 2019
FAC Filed:	
Trial Date:	None Set

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I, **Liszandra Padilla**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named 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 Defendant Communicare Health Centers (“Communicare”) from approximately July 2015 to approximately April 2019 as a non-exempt, hourly paid employee. I decided to seek legal advice about my work experiences at Communicare and about filing a lawsuit to seek redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Communicare was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 3 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 4 hours discussing my situation, complex wage-and-hour class actions and representative action lawsuits under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff and a class representative.

3. I have spent over 4 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included providing documents concerning my employment with Communicare, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Communicare. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout my involvement in this 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 them as quickly as possible and gave them as much information as I could. I

1 spent at least 3 additional hours speaking with my attorneys about the case, sending them
2 documents, identifying potential witnesses, and also describing policies, practices, and
3 procedures of Communicare.

4 5. I spent about 2 hours reviewing the settlement agreement and about 2 hours
5 asking questions and discussing the potential settlement with my attorneys before signing the
6 settlement agreement.

7 6. I believe that I have done everything that my attorneys have asked of me and
8 tried, to the best of my ability, to represent the class.

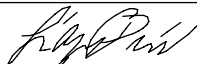
9 7. I respectfully request that the Court award me an enhancement payment in the
10 amount of \$2,500.00 for my active participation in this case. Taking into consideration the time
11 that I have dedicated to this case, I believe that this amount is reasonable.

12 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

13 9. I have not entered into any undisclosed agreements, nor have I received any
14 undisclosed compensation in this case. The only compensation I will receive is an enhancement
15 payment, as well as my share of the settlement as a class member.

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

18 Executed this ^{06/20/2022} day of June 2022, at Sacramento, California.

19 
20 Electronically Signed: 2022-06-20 22:43:51 UTC - 73.116.24.120
Nintex AssureSign® 3f23a581-6998-4e2d-8d63-aeba017545d5

Lizabeth Padilla