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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

BRITTNEY LEGASPI, as an individual and  
on behalf of all others similarly situated,

Plaintiff,

v.

MERCEDES DIAZ HOMES, INC., a  
California Corporation; MDH SPECIALIZED  
CARE HOMES 1, a California Corporation;  
MDH SPECIALIZED CARE HOMES 2, a  
California Corporation; MDH SPECIALIZED  
CARE HOMES 3, a California Corporation;  
and DOES 1 through 100,

Defendants.

Lead Case No. 20STCV45683

*Consolidated with Case Nos. 21NWCV00493  
and 21STCV20211*

*[Assigned for all purposes to the Hon. Richard  
L. Fruin, Dept. 15]*

**DECLARATION OF BRITTNEY  
LEGASPI IN SUPPORT OF MOTION  
FOR SETTLEMENT APPROVAL OF  
CLAIMS BROUGHT UNDER THE  
PRIVATE ATTORNEYS GENERAL ACT,  
REASONABLE ATTORNEYS' FEES AND  
COSTS, AND ENHANCEMENT AWARD**

Date: September 28, 2022

Time: 9:15 a.m.

Dept.: 15

**Reservation ID: 394490844032**

Action Filed: November 30, 2020

Trial Date: None Set

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I, Brittney Legaspi, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Mercedes Diaz Homes, Inc. (“MDH”) as a non-exempt employee from March 19, 2011 through July 24, 2020. During my employment, I was always on duty during my shifts and I never had an opportunity to be relieved of duty for a meal or rest period. I also often felt that my hours were not accurately recorded and that I was missing hours from my paychecks. I was also required to use my personal cell phone at times for work purposes but was never reimbursed for any of my cell phone expenses.

3. When I filed this lawsuit, I understood that it had the chance to benefit other workers by helping them recover penalties owed to them. I knew there were risks associated with filing a lawsuit, but I accepted the risks because I wanted MDH to comply with the law. Even though I understood that this lawsuit would be a public record, I accepted that burden for the benefit of MDH's other workers.

4. I have been actively involved in this case since before it was filed. Among other things, I gathered documents and provided them to my attorneys, and had numerous discussions with my attorneys regarding the lawsuit and case strategy, MDH's policies and practices, and my work experiences at MDH. I estimate that I have spent approximately 10 hours on these activities.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on 07/05, 2022 at Lake Elsinore, California.

*Brittney Gaspi*  
Brittney Gaspi (Jul 5, 2022 17:57 PDT)

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Brittney Legaspi