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Attorneys for Plaintiff

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

MARIE RAMOS, individually, and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

GREEN CARE CENTER OF FILLMORE,
LLC, a California limited liability company;
and DOES 1 through 100, inclusive,

Defendants.

Case No. 56-2021-00549583-CU-OE-VTA

Honorable Kelly Berlingeri
Department 22B

**DECLARATION OF MARIE RAMOS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRIVATE ATTORNEYS
GENERAL ACT (CAL. LAB. CODE §
2698, *ET SEQ.*) SETTLEMENT
AGREEMENT AND AWARD OF
ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION
COSTS**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Lab.
Code § 2698, *Et Seq.*) Settlement Agreement
and Award of Attorney's Fees and Costs,
General Release Fee, and Settlement
Administration Costs; Declaration of
Plaintiff's Counsel (Edwin Aiwazian); and
[Proposed] Order and Judgment filed
concurrently herewith]

Reservation ID: 2715798
Date: May 12, 2023
Time: 8:30 a.m.
Department: 22B

Complaint Filed: January 12, 2021
Trial Date: None Set

DECLARATION OF MARIE RAMOS

I, **Marie Ramos**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case, and 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 Greenfield Care Center of Fillmore, LLC ("Greenfield") as an hourly-paid, non-exempt employee from December 2018 to May 2020. I decided to seek legal advice about my work experiences at Greenfield and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Greenfield 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 employment law firms in California for approximately **8 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **7 hours** discussing my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA") generally, and what it meant to bring a PAGA action.

3. I have spent over **22 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included gathering and providing documents concerning my employment with Greenfield, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly-paid, non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Greenfield. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with 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 spent at least **15 additional hours** speaking with my attorneys about the case, sending them

1 documents, identifying potential witnesses, and also describing policies, practices, and
2 procedures of Greenfield.

3 5. I spent about **3 hours** reviewing the settlement agreement and about **2 hours**
4 asking questions and discussing the potential settlement with my attorneys before signing the
5 settlement agreement.

6 6. I believe that I have done everything that my attorneys have asked of me and have
7 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
8 California. I think my efforts helped to get the result obtained in this case.

9 7. I respectfully request that the Court award me a general release fee in the amount
10 of \$10,000.00 for my active participation in this case and broader release of claims. Taking into
11 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

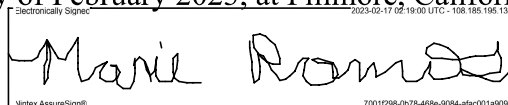
12 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

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 whatever amount
15 the Court awards as a general release fee, as well as my share of the settlement as an aggrieved
16 employee.

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

02/16/2023

19 Executed this ____ day of February 2023, at Fillmore, California.

20 The image shows a handwritten signature of Marie Ramos in black ink. The signature is written in a cursive style. Above the signature, there is a small rectangular box containing the text "Electronically Signed" and "2023-02-17 02:19:30 UTC - 106.186.196.137". Below the signature, there is another small rectangular box containing the text "Vertex AssureSign®" and "7001f298-0b78-468e-9084-afac001a909c".

21 Marie Ramos