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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SOLANO**

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

Plaintiff,

vs.

FAIRFIELD POST-ACUTE REHAB, an
unknown business entity; FAIRFIELD
HEALTH CARE, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: FCS056452

Honorable Christine Carringer
Department 12

**DECLARATION OF MARIA CAIN IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LAB. CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS, ENHANCEMENT AWARD, 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 Attorneys' Fees and Costs,
Enhancement Award, and Settlement
Administration Costs; Declaration of PAGA
Counsel (Edwin Aiwarzian); and [Proposed]
Order and Judgment filed concurrently
herewith]

Date: December 15, 2022
Time: 8:30 a.m.
Department: 12

Complaint Filed: February 19, 2021
Trial Date: None Set

DECLARATION OF MARIA CAIN

I, **Maria Cain**, 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 Defendant Fairfield Post-Acute Rehab (“Fairfield”) from approximately February 2019 to approximately November 2019 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences at Fairfield. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Fairfield was held accountable for not paying its aggrieved employees for all hours worked and for 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 12 hours. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for almost 8 hours discussing my situation, representative actions under the Private Attorneys General Act (“PAGA”), and what it meant to bring a PAGA action.

3. I have spent over 21 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Fairfield, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Fairfield. 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. As the matter progressed, I was available to answer any questions my attorneys had, and available to speak and meet with them whenever they needed me. I responded to my attorneys as quickly as possible and gave them as much information as I could and identified as many documents as I could. I spent at least 18 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of

Fairfield.

5. As far as the settlement is concerned, I spent about 3 hours reviewing the settlement papers and an additional 4 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a PAGA representative, I respectfully request that the Court approve and award me an Enhancement Award in the amount of \$10,000.00 for my efforts and active participation in the case and broader release of claims. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

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

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is an enhancement payment, if approved by the Court, as well as my share of the settlement as an aggrieved employee.

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

Executed this ^{10/13} day of October 2022, at Fairfield, California.

Electronically Signed 2022-10-13 19:08:00 UTC - 76.21.81.137
Maria Cain
Nintex AssureSign® 96955c8a-2262-4909-c0e5-af2d013908b8

Maria Cain