

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Brittany Shaw (SBN 331773)
LAWYERS for JUSTICE, PC
450 N. Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

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

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

Plaintiffs,

vs.

SENT MANAGEMENT SERVICES, LLC,
a California limited liability company; and
DOES 1 through 100, inclusive,

Defendant.

Case No.: 34-2021-00302142-CU-OE-GDS

Honorable Jill H. Talley
Department 23

**DECLARATION OF LINDA
HILDEBRANDT IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF PRIVATE ATTORNEYS GENERAL
ACT (CAL. LABOR 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. Labor
Code § 2698, *Et Seq.*) Settlement Agreement
and Award of Attorneys' Fees and Costs,
General Release Fee, and Settlement
Administration Costs; Declaration of Plaintiff's
Counsel (Brittany Shaw); and [Proposed]
Order and Judgment filed concurrently
herewith]

Reservation ID: A-302142-001
Date: January 31, 2025
Time: 9:00 a.m.
Department: 23

Complaint Filed: June 8, 2021
Trial Date: None Set

DECLARATION OF LINDA HILDEBRANDT

I, **Linda Hildebrandt**, 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 SENT Management Services, LLC (“SENT Management”) from approximately February 2016 to approximately March 2020 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experience with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for its practice of not properly compensating its 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. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC, discussing my situation, representative action lawsuits under the California Private Attorneys General Act (“PAGA”), and what it meant to bring a PAGA Action and be a PAGA representative.

3. I have spent substantial time and effort meeting 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 SENT Management, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly non-exempt employees, and helping develop a strategy as to what documents and information to obtain from SENT Management. 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 case progressed, I was available to answer any questions my attorneys had and was 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 and identified as many documents as I could. I spoke 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 SENT Management.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I reviewed settlement agreement and asked questions and discussed the potential settlement with my attorneys before signing the settlement agreement.

6. 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 a general release fee, if approved by the Court, as well as my share of the settlement as an aggrieved employee.

7. I fully understand the risk I faced in serving as a PAGA representative and that doing so could make the case more complex. However, I do so to ensure that not only myself, but other aggrieved employees, would be able to receive what they were owed.

8. Since joining this lawsuit, I have considered the interests of the aggrieved employees just as I would consider my own interests. I understand and have understood throughout the lawsuit that I must put the interests of the aggrieved employees and the State of California before my own interests. Although I was concerned and afraid about being the PAGA Representative in this public lawsuit, I decided to put my own interests aside and bring a lawsuit that would be beneficial not just for myself, but for all aggrieved employees. To the best of my knowledge, I have not yet suffered any adverse consequences as a result of this lawsuit, but neither have I received any benefit for being a PAGA Representative or for the help I provided my attorneys. As of this date, I have not incurred any expenses to further prosecution of these actions.

9. Further, as part of the Settlement, I have agreed to a much broader individual release than that agreed to by the State of California on behalf of the aggrieved employees. This release encompasses all claims I have against the Released Parties, arising at any time up to and including the effective date.

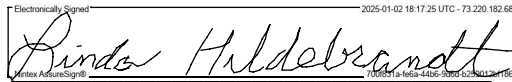
10. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case. I respectfully request that the

1 Court approve and award me a general release fee in the amount of \$15,000.00 for my efforts
2 and active participation in the case and broader release of claims. Taking into consideration the
3 time that I dedicated to this case, I believe that this amount is reasonable.

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

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

7 Executed this 5th day of January 2, 2025, at Sacramento, California.

8 The image shows an electronic signature of Linda Hildebrandt. The signature is written in a cursive script. Above the signature, the text "Electronically Signed" is visible. To the right of the signature, the date and time "2025-01-02 18:17:25 UTC - 73.220.182.68" are displayed. Below the signature, the text "VeriSign AssureSign®" is visible.

9 Linda Hildebrandt
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