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Attorneys for Plaintiffs MARIA AYALA and ROSA HANDS

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

MARIA AYALA, individually, and on behalf of
other members of the public similarly situated,
and on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act; ROSA HANDS, individually, and
on behalf of other members of the public
similarly situated, and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act;

Plaintiffs,

vs.

SDH SERVICES WEST, LLC, a Delaware
limited liability company; SODEXO, INC., a
Delaware corporation; and DOES 1 through 25,
inclusive,

Defendants.

Case No. BCV-21-101933

Honorable Thomas S. Clark
Department 17

**DECLARATION OF PLAINTIFF ROSA
HANDS IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: May 17, 2024
Time: 8:30 a.m.
Dept.: 17

Complaint Filed: August 20, 2021
Trial Date: None Set

DECLARATION OF ROSA HANDS

I, Rosa Hands, declare and state as follows:

1. I am over the age of eighteen (18) and I am a resident of the State 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 SDH Services West, LLC ("SDH") as an hourly-paid, non-exempt Housekeeper at Long Beach Memorial Medical Center from approximately October 2013 to approximately June 30, 2021.

3. I decided to seek legal advice about my work experiences at SDH and about filing a lawsuit to seek to redress my grievances. I contacted Blackstone Law, APC and spoke with the attorneys there. I wanted to take steps to make sure SDH was held accountable for not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA action.

4. I have regularly conferred with my attorneys regarding the case and fulfilling my responsibilities as a class action representative, which has included providing documents concerning my employment with SDH, reviewing documents with my attorneys and answering their questions, providing information and guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from SDH. 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.

5. Throughout my involvement in this case, 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 as I could. I described policies, practices, and procedures of SDH. I contacted and referred several potential witnesses and

1 potential class members to my attorneys. In preparing for mediation, I spent numerous hours
2 reviewing documents provided by SDH.

3 6. I understood that in the event this matter did not settle and proceeded with trial, I would
4 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
5 responsibilities that are necessary for this lawsuit.

6 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
7 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
8 also understood there was a risk of losing any current job and/or income due to the time that I would
9 have to spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed.
10 Most importantly, I believe that by pursuing this case, I have taken a significant risk because future
11 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
12 to find employment within this industry – and even outside of it – in the future. In contrast, the other
13 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
14 that I took in bringing this action.

15 8. I have reviewed the settlement agreement. I discussed the settlement agreement with
16 my attorneys and asked them questions before signing it.

17 9. I believe that I have done everything that my attorneys have asked of me and tried, to
18 the best of my ability, to seek relief for the Class. In total, I have spent approximately 35 to 38 hours
19 participating in this case as described above. I think my efforts helped to get the result obtained in
20 this case.

21 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
22 approval, and any settlement must be designed in the best interest of the Class as a whole. I have at
23 all times throughout the course of this litigation considered the interest of the Class.

24 11. I understand that incentive or enhancement awards are discretionary and intended to
25 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
26 other employees; the financial and/or reputational risk undertaken in bringing the class action, and an
27 acknowledgment of the benefits resulting from the representative's actions. I believe my work in this
28 matter is meritorious on these points for the reasons set forth above.

1 12. I respectfully request that the Court approve and award me a service award in the
2 amount of \$5,000.00 for my efforts and active participation in the case and broader release of claims.
3 Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

4 13. I am not related to anyone associated with Blackstone Law, APC.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct. Executed on 04/05/2024, at Los Angeles, California.

7
8 
9 Rosa Hands