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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 MIRIAM L. SCHIMMEL
IN SUPPORT OF PLAINTIFFS' RENEWED
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: December 4, 2023
Time: 8:30 a.m.
Dept.: 17

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

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1. I am a Senior Attorney with the law firm of Blackstone Law, APC (“Class Counsel”), attorneys of record for Plaintiffs Maria Ayala and Rosa Hands (together, “Plaintiffs”).

3. I am fully familiar with the legal and factual issues in this case and have specific experience litigating complex wage and hour actions as class actions, including employment cases as set forth above.

4. I obtained my Bachelor of Arts degree in Political Science from the University of California at Los Angeles in 1992.

6. Since my admission to the Bar, I have devoted my practice to a wide variety of litigation matters on both the plaintiff and defense side, including general business, toxic tort, medical device and pharmaceutical matters. I was also part of the lead litigation team that prosecuted the coordinated civil lawsuits for negligent hire/retention/employment for abuse inflicted by clergy employed by the Catholic church in California. I was also significantly involved representing homeowners in the multitude of Truth-In-Lending-Act class action lawsuits filed against various financial institutions in connection with this country's 2008 collapse of the mortgage industry.

7. Since 2010, my practice has been devoted almost entirely to employment litigation consisting of wage and hour class actions and representative actions pursuant to the Private Attorneys General Act (“PAGA”), as well as individual actions based on violations of the Fair Employment and Housing Act (“FEHA”). Approximately 75% of my work in this regard has been on behalf of employees (plaintiffs), while the remaining 25% was on behalf of employers/businesses. On many of those cases, I was the senior lead attorney managing the litigation and overseeing other attorneys. In

1 that capacity, I obtained extensive experience analyzing potential wage and hour and wrongful
2 termination claims for viability; took and defended hundreds of depositions; propounded and
3 responded to discovery; prepared and opposed a wide variety of motions and pleadings, including
4 dispositive and certification motions, as well as settlement approval motions; strategized on all cases;
5 participated in and directed communication with class members; attended hearings; led and
6 participated in mediations; coordinated with class action administrators; prepared and worked with
7 experts; and engaged in all other related aspects of litigation in state, federal, complex and appellate
8 courts.

9 8. During the last 13 years, I have litigated several hundred complex, consumer and wage
10 and hour class and representative action matters. A very partial list of the cases in which I was the lead
11 attorney or held a significant role in litigating the case to either class certification and/or settlement
12 includes:

- 13 • *Medlock v. Taco Bell Corp.*, Case No. 1:07cv1314 (E.D. Cal. September 7, 2007);
- 14 • *Medrano, et al. v. Party City Corporation*, Case No. 2:16cv2996 (E.D. Cal. December
15 22, 2016);
- 16 • *Washington v. HMS Host USA, Inc., et al.*, Case No. 5:12cv1541 (C.D. Cal. September
17 10, 2012);
- 18 • *Miranda v. Magic Mountain, LLC, et al.*, Case No. BC67585 (Cal. Sup. Ct., Los
19 Angeles County);
- 20 • *Owens v. O'Reilly Automotive Stores, Inc., et al.*, Case No. BC475210 (Cal. Sup. Ct.,
21 Los Angeles County);
- 22 • *Coleman v. Estes Express Lines, Inc., et al.*, Case No. 2:10cv2242 (C.D. Cal. March
23 26, 2010);
- 24 • *In Re: Autozone, Inc., Wage and Hour Employment Practices Litigation*, Case No.
25 3:10md2159 (N.D. Cal. June 15, 2010);
- 26 • *Medlock v. Host International, Inc., et al.*, Case No. 1:12cv2024 (E.D. Cal. December
27 13, 2012);
- 28 • *White v. SHR Palo Alto LLC, et al.*, Case No. 17-CIV-03178 (Cal. Sup. Ct., San Mateo

County);

- *Romo et al. v. GMRI, Inc.*, Case No. 5:12cv715 (C.D. Cal., May 7, 2012);
- *Edelstein v. Westlake Wellbeing Properties, LLC*, Case No. 2:17cv6488, (C.D. Cal. September 1, 2017);
- *Aberdeen v. Toyota Motor Sales, U.S.A., Inc., et al.*, Case No. 2:08cv1690 (C.D. Cal. March 12, 2008);
- *Lawson v. Graphic Packaging International, LLC*, Case No. 20CV01921 (Cal. Sup. Ct., Butte County); and
- *Reyes v. Sky Chefs, Inc.*, Case No. 3:20cv8590 (N.D. Cal. December 4, 2020).

9. I joined Blackstone Law, APC in June 2022, following ten years of working with two well-known plaintiff-side wage and hour law firms in Los Angeles. When I joined Blackstone, I took over approximately 35-40 cases, including this one.

10. Based on my history litigating class, representative actions, and other complex litigation matters, I have substantial relevant experience sufficient to represent the Class and be named as Class Counsel in this matter.

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

Executed on October 12, 2023, at Beverly Hills, California.

Miriam L. Schimmel

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