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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 MARIA
AYALA 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

DECLARATION OF MARIA AYALA

I, Maria Ayala, 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 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 am a named plaintiff in this action, and I seek to be appointed as the representative of the proposed class for purposes of settlement.

3. 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 1990 to approximately June 30, 2021. 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. Since becoming involved in this matter, I have regularly conferred with my attorneys regarding the case and fulfilling my responsibilities as a class action and PAGA 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 have reviewed the settlement agreement. I discussed the settlement agreement with
4 my attorneys and asked them questions before signing it.

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

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

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

14 10. I am not related to anyone associated with Blackstone Law, APC.

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16 Executed on 09/28/2023, at Los Angeles, California.

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