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Attorneys for Plaintiff Jennara Beshears

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

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

Plaintiff,

vs.

ONSITE DENTAL, LLC, an unknown business
entity; ONSITE DENTAL ADMINISTRATION,
LLC, a Delaware limited liability company; L.
THOMAS MILLER, D.D.S. DENTAL
PRACTICE, P.C. a California corporation; L.
THOMAS MILLER, D.D.S., P.C. a California
corporation; ERNEST BLACKWELDER,
individually; LEIGHTON MILLER, individually;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: CGC-21-595354

Honorable Joseph M. Quinn
Department 302

**DECLARATION OF JENNARA BESHEARS 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**

Date: April 9, 2025
9:00 a.m.

Time: 302
Department:

Complaint Filed: September 20, 2021

Trial Date: February 10, 2025

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I, Jennara Beshears, 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. 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 Onsite Dental, LLC, Onsite Dental Administration, LLC, L. Thomas Miller D.D.S. Dental Practice, P.C., and L. Thomas Miller, D.D.S. (collectively, the “Defendants”) from approximately November 2019 to approximately March 2020 and again from approximately June 2020 to approximately July 2020 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences with Defendants and about pursuing legal action. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for their practice of not properly compensating their 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 Private Attorneys General Act (“PAGA”), and what it means to bring a PAGA Action and be a PAGA representative.

3. I have spent many hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, providing information regarding the duties of aggrieved employees, and helping develop a strategy as to what documents and information to obtain from Defendants. 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. 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 spent many hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and describing policies, practices, and procedures of Defendants. Further, I spent time reviewing and responding to discovery requests propounded by Defendant Onsite Dental,

1 LLC, including, but not limited to, special interrogatories and requests for production of documents.

2 4. As far as the settlement is concerned, I was available to review documents and answer any
3 questions my attorneys had. I spent several hours reviewing the settlement agreement and asking questions
4 and discussing the potential settlement with my attorneys before signing the settlement agreement.

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

8 6. For my broader individual waiver and release of claims with a California Civil Code Section
9 1542 waiver (set forth in Section 10(b) of the Settlement Agreement), the Settlement provides for a
10 General Release Fee in the amount of up to \$10,000.00, to be paid out of the Total Settlement Amount,
11 subject to Court approval. I respectfully request that the Court award me full payment of the General
12 Release Fee.

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

14 8. I have not entered into any undisclosed agreements, nor have I received any undisclosed
15 compensation in this case. The only compensation I will receive is whatever amount the Court awards me
16 for the General Release Fee, as well as my share of the settlement as an aggrieved employee.

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

12/26/2024

19 Executed this ___ day of December 2024, at Antioch, California.

20 Electronically Signed 2024-12-27 03:53:01 UTC - 38.75.137.9

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