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Attorneys for Plaintiffs and the Class

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

VALENCIA KING, individually, and on
behalf of other members of the general public
similarly situated; VICTORIA PERKINS,
individually, and on behalf of other members
of the general public similarly situated,

Plaintiffs,

vs.

LEISURE CARE, LLC, a Washington
limited liability company; FRESN, LLC, a
Washington limited liability company;
LIVERMORE SENIOR LIVING, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: RG21099267 (*Consolidated with*
Case No. RG21112925)

Honorable Michael Markman
Department 23

CLASS ACTION

**DECLARATION OF VALENCIA KING IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
CLASS COUNSEL FEES PAYMENT AND
LITIGATION EXPENSES PAYMENT,
AND SERVICE PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action and PAGA
Settlement, Class Counsel Fees Payment and
Litigation Expenses Payment, and Service
Payments; Declaration of Class Counsel
(Selena Matavosian); Declaration of Class
Representative (Victoria Perkins); Declaration
of Settlement Administrator (Kevin Lee); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: December 12, 2024
Time: 10:00 a.m.
Department: 23

Complaint Filed: May 14, 2021
FAC Filed: March 4, 2024
Trial Date: None Set

DECLARATION OF VALENCIA KING

I, **Valencia King**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of 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 Leisure Care, LLC (“Leisure Care”) from approximately November 2019 to approximately June 2021 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Leisure Care 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 Leisure Care was held accountable for not properly compensating their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **8 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **10 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative.

3. I have spent over **22 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Leisure Care, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Leisure Care. 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.

4. Throughout the case, I was available to answer any questions my attorneys had, and 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 at least **15 additional hours** speaking 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 Leisure Care.

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

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me a service payment in the amount of \$14,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

8. 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 whatever amount the Court awards as a service payment, as well as my share of the settlement as a class member and as an aggrieved employee.

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

Executed this ^{04/25/2024} day of April 2024, at Livermore, California

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Valencia King