

1 ZACK I. DOMB, SBN 265185
E-Mail zack@dombrauchwerger.com
2 DEVIN RAUCHWERGER, SBN 274234
E-Mail devin@dombrauchwerger.com
3 **DOMB & RAUCHWERGER LLP**
1055 East Colorado Blvd., Fifth Floor
4 Pasadena, California 91106
Telephone: (213) 537-9225

5 EDWIN AIWAZIAN, SBN 232943
E-mail: edwin@calljustice.com
6 ARBY AIWAZIAN, SBN 269827
E-Mail: arby@calljustice.com
7 JOANNA GHOSH, SBN 272479
E-Mail: joanna@calljustice.com
8 ELIZABETH PARKER-FAWLEY, SBN 301592
E-Mail: elizabeth@calljustice.com
9 **LAWYERS for JUSTICE, PC**
10 450 N Brand Blvd, Suite 900
Glendale, California 91203
11 Tel: (818) 265-1020 / Fax: (818) 265-1021

12 Attorneys for Plaintiffs
13 Rebecca Hannett, Mitzi Yaloha Burciaga and the Proposed Class

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

16 REBECCA HANNETT, individually, and
17 on behalf of other members of the general
public similarly situated; MITZI YALOHA
18 BURCIAGA, individually, and on behalf of
other members of the general public
19 similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

20 Plaintiffs,

21 vs.

22 SERENDIPITY HEARING, INC., an
23 unknown business entity; SERENDIPITY
HEARING, INC., a California corporation;
24 WILLARD CLAYTON GILILLAND,
individually; SONUS HEARING CARE
25 PROFESSIONALS, an unknown business
entity; and DOES 1 through 100, inclusive,

26 Defendants.
27
28

Case No.: 30-2021-01216930-CU-OE-CXC
(Related to Case No.: 30-2021-01229201 and
Consolidated for Pre-Trial Purposes Only)

**DECLARATION OF REBECCA HANNETT
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Information:

Date: June 11, 2026
Time: 2:00 PM
Dept.: CX105
Judge: Hon. Melissa R. McCormick

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

1. I am over the age of 18 years old and a resident of the United States. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would do so competently. I make this declaration in support of Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement.

3. I was employed by Serendipity Hearing, Inc. (“Serendipity” or “Defendants”) as an hourly-paid non-exempt Administrative Assistant from approximately February 2019 to approximately April 2020.

5. I researched Lawyers for Justice, PC and saw they had a lot of experience in employment law and gave them a call. After an initial call, I was asked numerous questions about my background, my employment history, and my work for Serendipity. They also asked me for, and I provided the employment documents I received from Serendipity that were still in my possession. I spent hours going through documents, emails, and my cell phone in order to locate documents related to my employment that could be useful to my attorneys in litigating the case. The attorneys also provided me with information about wage and hour law and my rights under those laws and did so throughout the pendency of this case.

6. I read about Lawyers for Justice, PC and saw their track record for success with respect to handling cases, so I felt confident it was best for me to proceed with them. I thereafter reviewed and signed a representation agreement with Lawyers for Justice, PC after they explained to me what my duties and responsibilities were as a representative of all employees who worked

1 for Serendipity during the class period.

2 7. It was a difficult decision to move forward as a named plaintiff in this Action
3 because I feared that filing a lawsuit would be a stain on my record and ability to continue to earn
4 a living in the future. I believe employers generally do not favor individuals who file lawsuits
5 against their former employers. However, I decided that being a named plaintiff in this Action
6 was the right thing to do in order to make sure that this did not continue happening to current
7 employees and to ensure that both current and former employees were able to get some recovery
8 for what I believe were unfair issues with pay.

9 8. After I signed up, I was contacted numerous times by Lawyers for Justice as they
10 prepared the Complaint, as they had additional questions for me that they wanted me to answer
11 before they proceeded with filing the action. Once a draft was prepared, I thoroughly reviewed
12 the legal Complaint that was to be filed and had discussions with Lawyers for Justice about its
13 contents before it was filed.

14 9. As a responsible representative, I have been thoroughly involved in the case for
15 almost four years. I received a deposition notice with document requests from Serendipity, and
16 my attorneys prepared me in advance and defended my deposition. I met with my attorneys on
17 multiple days over several hours before my deposition in order to prepare, and then spent the
18 entire day testifying for my deposition. I also reviewed numerous documents that my counsel
19 received from Serendipity regarding my employment so that I could answer various questions
20 that my attorneys had for me about them.

21 10. Once the Parties agreed to mediate the case, I had additional discussions with my
22 counsel regarding what mediation would look like as well as settlement possibilities. I also
23 reviewed the mediation statement that my attorneys prepared and gave them my additional input
24 based on my time working for Serendipity. I was available and participated in two days of
25 mediation, which required me to take time away from work and personal obligations.

26 11. Once a settlement was reached after mediation, Lawyers for Justice discussed with
27 me bringing in Domb & Rauchwerger LLP to help with the settlement process. I separately looked
28 into the law firm of Domb & Rauchwerger LLP to make sure that I was comfortable with the firm

1 coming on to handle the settlement portion of the case.

2 12. After the settlement agreement was prepared, I spent a significant amount of time
3 reviewing and discussing with my attorneys. I also reviewed and prepared declarations in support
4 of the motion for preliminary and final approval.

5 13. I understood from the beginning of the case that I would have an important duty
6 to look out for the best interests of the class. I also understood from the start of considering this
7 case, based on my discussions with my lawyers, that I would have to take on significant
8 responsibilities and burdens for the benefit of the class, including having my deposition taken to
9 give testimony under oath, which was indeed taken, and that I could face the possibility of
10 subpoenas being issued to former and current employers, and that I might have to testify in Court
11 for the benefit of not only myself but the other employees.

12 14. I have taken my responsibility as a Representative seriously and will continue to
13 do so. I have learned about the laws relating to payment of wages, requirements for meal and rest
14 periods, and the other issues in this Action.

15 15. I believe that I had a similar experience with Defendants compared to the other
16 Class Members because we were all subjected to the same policies and practices.

17 16. I estimate that I spent approximately 65 hours on this matter, including working
18 on the tasks discussed above, such as responding to discovery requests, being available for two
19 full days of mediation and reviewing the settlement agreement.

20 17. Based on my efforts in this case, finding a lawyer, organizing and providing
21 numerous documents to my lawyer that were very helpful to the case, numerous calls and emails
22 with my lawyer, being named as a plaintiff in a lawsuit, having my deposition taken, participating
23 in the mediation process, my participation in the lawsuit as summarized above, and the settlement
24 we were able to achieve, I believe the requested incentive payment of \$5,000 is appropriate.

25 I declare under penalty of perjury under the laws of the United States and the State of
26 California that the foregoing is true and correct. Executed on May 18, 2026, in Victorville, California.

27
28 
REBECCA HANNETT