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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 YALOA  
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 MITZI YALOA  
BURCIAGA 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

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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 Defendants as an hourly-paid, non-exempt Patient Care Coordinator from approximately March 2022 to approximately November 2022, in Los Angeles County, California.

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

1           6.       Once the Parties agreed to mediate the case, I had additional discussions with my  
2 counsel regarding what mediation would look like as well as settlement possibilities. I also  
3 reviewed the mediation statement that my attorneys prepared and gave them my additional input  
4 based on my time working for Defendant. I participated in two days of mediation and had to take  
5 time out of my schedule to be involved

6           7.       Once a settlement was reached, Lawyers for Justice discussed with me bringing in  
7 Domb & Rauchwerger LLP to help with the settlement process. I separately looked into the law  
8 firm of Domb & Rauchwerger LLP to make sure that I was comfortable with the firm coming on  
9 to handle the settlement portion of the case.

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

13          9.       I understood from the beginning of my case that I would have an important duty  
14 to look out for the best interests of the class. I also understood from the start of considering this  
15 case, based on my discussions with my lawyers, that I would have to take on significant  
16 responsibilities and burdens for the benefit of the class, including the possibility of having my  
17 deposition taken to give testimony under oath, and that I could face the possibility of subpoenas  
18 being issued to former and current employers, and that I might have to testify in Court for the  
19 benefit of not only myself but the other employees. I have had numerous conversations with my  
20 attorneys regarding this case in order to provide them with the information and documents that  
21 they needed to handle the matter. I answered numerous questions that my attorneys had about the  
22 case, reviewed the complaint when it was filed, participated in discussions about mediation and  
23 resolution of the matter, and reviewed the settlement agreement.

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

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

12. I estimate that I spent approximately 35 hours on this matter, including working on the tasks discussed above.

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

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

  
MITZI YALOHA BURCIAGA