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**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE-CIVIL COMPLEX CENTER**

LOURDES VASQUEZ, as an individual and
on behalf of other similarly situated employees,

Plaintiff,

vs.

KRC SANTA MARGARITA, LLC., a
California corporation, KISCO SENIOR
LIVING, LLC, a California corporation, and
DOES 1-50, inclusive,

Defendants.

CASE NO: 30-2021-01238849-CU-OE-CXC

Assigned For All Purposes To:
Hon. Melissa McCormick
Dept. CX104

**DECLARATION OF LOURDES
VASQUEZ IN SUPPORT OF MOTION
FOR ORDER APPROVING
SETTLEMENT UNDER CALIFORNIA
LABOR CODE SECTION 2699 ET SEQ**

Hearing Date: March 27, 2025
Hearing Time: 2:00 p.m.
Department: CX104

Case filed: December 30, 2021
Trial date: TBD

**DECLARATION OF LOURDES VASQUEZ IN SUPPORT OF MOTION FOR ORDER
APPROVING SETTLEMENT UNDER CALIFORNIA LABOR CODE SECTION 2699
ET SEQ**

1 I, Lourdes Vasquez, declare as follows:

2 1. I currently reside in California. I am over the age of eighteen and have personal
3 knowledge of everything stated below and could competently testify to these facts if sworn.

4 2. I submit this Declaration in support of the motion for approval of Private Attorney
5 General Act claims.

6 3. I worked for Defendant KRC Santa Margarita, LLC, ("Defendant"). I worked for
7 Defendant as an hourly worker. While working for Defendant I worked very hard and felt that I
8 was not being treated like a valued worker. After my employment ended with Defendant, I
9 determined that I would attempt to effectuate a change in Defendant's practices and policies
10 through a representative action under the Private Attorney General Act. After consulting with a
11 law firm, I decided to file a representative action claim against Defendant. I would consider
12 myself a lower wage hourly worker but despite this I still decided to take the risk of filing this
13 representative action and risk losing this case that could have exposed myself and my family to
14 certain attorneys' fees and costs incurred by Defendant. However, my passion to vindicate the
15 rights of my coworkers outweighed the risk exposure to myself and my family as I believed that
16 my co-workers deserved to be treated fairly in the eyes of the law.

17 4. Throughout this case, I was required to answering questions during several interviews
18 by my attorney and the staff either in person or via telephone related to the case, and locating and
19 submitting documents to my attorney in support of the claims.
20

21 5. Throughout this litigation, I made myself available for a full-day mediation. This
22 mediation ended with a mediator's proposal. During the mediation, I remained involved and
23 provided information and details about Defendant's practices and policies in support of the
24 representative action claims so that the claims could be maximized for the aggrieved employees.
25 I also made myself available to complete the settlement agreement and finalize the terms of the
26 settlement agreement and execute the settlement agreement.
27
28

6. In this litigation, I was committed throughout the entire process to ensure that the private attorney general act members were treated fairly. I would estimate that I devoted approximately 45 hours to the prosecution and resolution of these claims.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 14, 2024 in California.



Lourdes Vasquez, Declarant