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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN DIEGO – NORTH COUNTY REGIONAL CENTER**
11

12 MARK TAYLOR and ANGELICA TRUJILLO,
individually and as private attorneys general on
13 behalf of the State of California

14 Plaintiff,

15 vs.

16
17 ACCENTCARE, INC., a Delaware corporation;
and DOES 1 through 10, inclusive,

18 Defendants
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Case No.: 37-2022-00004587-CU-OE-NC

Judge: Hon. Cynthia Freeland

Dept.: N-27

**DECLARATION OF PLAINTIFF
ANGELICA TRUJILLO IN SUPPORT OF
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

PRELIMINARY APPROVAL HEARING:

Date: June 27, 2025

Time: 1:30 p.m.

Dept.: N-27

Complaint Filed: February 4, 2022

Trial: Not set

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1 **DECLARATION OF ANGELICA TRUJILLO**

2 I, ANGELICA TRUJILLO, declare as follows:

3 1. I am a named Plaintiff in this case. I am a former employee of the named Defendant
4 AccentCare, Inc. (“Defendant”). As such, I have personal knowledge, or am informed and believe,
5 of the following facts herein stated. If called as a witness, I could and would testify competently to
6 the following:

7 **BACKGROUND OF EMPLOYMENT**

8 2. I worked for Defendant as an office coordinator from approximately July 2019 to April
9 2021. Throughout my employment, I have typically worked five days each week and in excess of
10 eight hours each workday.

11 3. During my employment with Defendant, I realized that its wage and hour practices
12 placed employees, including me, at a disadvantage. For instance, I was not compensated for all hours
13 worked, and I was not reimbursed for all necessary business expenses incurred. Additionally, I
14 regularly experienced problems taking full, timely, and uninterrupted meal periods and rest breaks.

15 **COMMONALITY AND PREDOMINANCE**

16 4. I believe that Defendant’s illegal wage and hour practices that affected me also affected
17 all their non-exempt employees. For instance, the practice of not paying for all hours worked affected
18 nearly all of Defendant’s non-exempt employees. Additionally, I believe that other employees also
19 experienced problems receiving reimbursement for necessary work expenses as well as their full,
20 timely, and uninterrupted meal and rest breaks.

21 5. As a result of Defendant failing to compensate for all time worked and failing to provide
22 legally compliant meal periods, and rest breaks, other employees and I were subjected to these illegal
23 wage and hour practices.

24 **TYPICALITY AND ADEQUACY**

25 6. I have been employed by Defendant in a non-exempt position during the putative Class
26 Period. Accordingly, I have brought this class action case on behalf of all other employees who are
27 also or were at some point classified as non-exempt during their employment with Defendant. I
28 believe my alleged claims in this case impacted not only me but the entire putative Class.

1 7. I am not aware of anything special about me that would raise unique defenses to my
2 claims, as opposed to the claims of the Class. I am not suing for anything unique to me; rather, my
3 claims are based on the same facts that relate to the rest of the Class.

4 8. I believe that I have no conflicts of interest with other putative Class Members or with
5 the proposed Settlement Administrator, and I have agreed to place Class interests above my own.

6 9. I have reviewed and consented to in a signed writing the joint prosecution and fee-
7 splitting agreement between my attorneys and Farnaes & Lucio, ACP, who represents Mark Taylor,
8 the other named Plaintiff in this action

9 DUTIES AS CLASS REPRESENTATIVE

10 10. This lawsuit is not an individual lawsuit; rather, it is a proposed class action. I understand
11 that as a Class Representative in this matter, I have an obligation to do my best to look out for the
12 interests of other Class Members. I understand that my obligations to the Class exist even when the
13 Class is certified solely as part of a class action settlement. It is my understanding that, as one part
14 of this duty to the Class, I cannot agree to a settlement to benefit myself to the exclusion of the rest
15 of the Class Members. I have never asked my attorneys to simply settle this matter at any cost; rather,
16 I have asked them to obtain the best settlement they could, within reason, and I believe they have
17 attempted to do so.

18 11. I have conferred with my attorneys about the Stipulation of Settlement (the “Settlement”)
19 in this case. I am not an accountant, but I generally understand the factors and risks that should be
20 considered when evaluating a settlement. I believe the Settlement is fair, adequate, and reasonable,
21 and therefore, I would recommend the Court approve it.

22 12. I understand the obligations of being an adequate Class Representative include
23 significant responsibilities and a fiduciary duty to represent the Class, which means responding
24 truthfully, completely, and promptly to any information requests made by my attorneys; reviewing
25 facts and claims in the case to make certain the alleged Labor Code violations are redressed;
26 participating dutifully in the litigation; making myself available for any meetings, proceedings, and
27 court hearings at which I am needed; and, above all, putting Class interests above my own.

28 13. I stepped in as Class Representative in full recognition and acceptance of my

responsibilities as the Class Representative, and I continue to appreciate the importance of my responsibilities as the litigation continues.

14. I have never asked to be relieved from my role as a Class Representative. To the contrary, I have made myself available whenever my attorneys wanted to discuss aspects of my employment by defendants, and I remain committed to seeing this matter through to the end.

15. My goal in pursuing this lawsuit was to obtain a recovery on behalf of the Class, and, even more importantly, to put an end to what I believe are illegal practices on the part of Defendant.

16. Summing it all up in the simplest terms, I asked to be a stand-in for other employees of Defendant as the Class Representative. Because of that, I cannot quit on the Class, and I cannot put myself and my interests before the Class. I accept these duties and respectfully request the Court appoint me as a Class Representative.

SERVICE AS A CLASS REPRESENTATIVE

17. I believe that were it not for me and Plaintiff Mark Taylor stepping forward and taking on the duties of protecting the interests of other Class Members in this case, it is likely that the interests of the Class would neither have been prosecuted nor benefited.

18. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to search for information online these days, I will face an increased risk that future employers will discover information about this lawsuit online and have a negative reaction to learning that I sued an employer. This may make it harder for me to obtain future employment or change jobs for a better opportunity.

19. I have devoted a substantial amount of my time to ensure a fair result for the employee class. This involved ongoing communications and participation with my counsel during the course of this case.

20. My participation began with bringing certain issues that are involved in this matter to my attorneys' attention and explaining the factual background that was used to prosecute the claims in this case.

21. For example, I provided to my attorneys and reviewed with them documents from my employment by Defendant that I had in my possession, and I explained those documents and related

1 facts to my attorneys to assist them in their review and analysis. I also assisted in identifying
2 potential witnesses, including other employees, who might likewise have been of assistance.

3 22. I also reviewed the Settlement with my attorneys to ensure that its terms are fair and
4 adequate.

5 23. In sum, I believe I have provided approximately 30 hours of my time during the course
6 of this litigation to ensure a good outcome for the best interests of the Class.

7 24. I have been, and will continue to be, actively involved in assisting my attorneys to
8 support this wage and hour action.

9 I declare under penalty of perjury, under the laws of the State of California, that the foregoing
10 is true and correct. Executed this _____, at Vallejo, California.

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13 ANGELICA TRUJILLO
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