Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

GLADYS VILLAGRANA, individually, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiff,

vs.

SHELLA CARE MANAGEMENT SERVICES, LLC, a California limited liability company; and DOES 1 through 100, inclusive,

Defendants.

Case No. CVRI2202930
Consolidated with CVRI2202932

Honorable Harold W. Hopp
Department 1

CLASS ACTION

DECLARATION OF PLAINTIFF GLADYS VILLAGRANA IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND ENHANCEMENT AWARD

Date:	November 23, 2024
Time:	8:30 a.m.
Department:	1
Complaint Filed:	July 14, 2022
Trial Date:	None Set

LAWYERS *for* JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale. California 91203

LAWYERS *for* JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale. California 91203

DECLARATION OF GLADYS VILLAGRANA

I, Gladys Villagrana, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case *Gladys Villagrana v. Shella Care Management, LLC*, Riverside County Superior Court Case No. CVRI2202930, consolidated with the case *Gladys Villagrana v. Shella Care Management, LLC*, Riverside County Superior Court Case No. CVRI2202932. 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 Shella Care Management Services, LLC ("Defendant") from approximately October 2018 to approximately August 2021, as an hourly-paid Caregiver. I decided to seek legal advice about my work experiences with Defendant 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 Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC 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. Prior to commencing the cases, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the cases, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. 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.

LAWYERS *for* JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale. California 91203

4. Throughout this matter, 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 time speaking with my attorneys about the cases, identifying potential witnesses, providing my attorneys with documents and information concerning the cases, and also describing policies, practices, and procedures of Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I reviewed the settlement agreement and discussed the potential settlement with my attorneys before signing the settlement agreement.

6. I think my efforts helped to get the result obtained in this matter, and as a potential class and PAGA representative, I respectfully request that the Court award me an enhancement award for my efforts in pursuing and participating in this matter, as well as my broader release of claims. Taking into consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC. In addition, I have no relationship or affiliation with the proposed *cy pres* recipient Riverside Legal Aid.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and aggrieved employee.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. 03/19/2026

Executed this ____ day of March 2026, at Moreno Valley, California.

Electronically Signed 2026-03-19 22:22:37 UTC - 47.152.228.206
Nintex AssureSign® d7e182fe-5cd4-489c-a511-b4120170519

Gladys Villagrana