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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

NATALI AMAYA, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

LIBERTY RESIDENTIAL SERVICES,
INC., a Pennsylvania corporation; LIBERTY
HEALTHCARE CORPORATION, an
unknown business entity; LIBERTY
HEALTHCARE OF CALIFORNIA, INC., a
California corporation previously identified
as fictitious DOE 1; and DOES 2 through 100,
inclusive,

Defendants.

Case No.: 37-2022-00014913-CU-OE-CTL
(LEAD CASE)

*Consolidated with Case No.: 37-2022-
00018859-CU-OT-CTL (PAGA Action)*

**DECLARATION OF NATALI AMAYA IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: August 15, 2025

Time: 8:30 a.m.

Judge: Hon. Mark T. Cumba
Dept.: C-65

1 I, NATALI AMAYA, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above
4 wage and hour class action filed against LIBERTY RESIDENTIAL SERVICES, INC., LIBERTY
5 HEALTHCARE CORPORATION, and LIBERTY HEALTHCARE OF CALIFORNIA, INC.
6 (hereinafter "Defendants")

7 2. This declaration is being submitted in support of Plaintiff's motion for Preliminary
8 Approval of Class Action and PAGA Settlement.

9 3. I believe that I am, have been and will continue to represent the interests of the class
10 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
11 to represent.

12 4. I worked for Defendants as a non-exempt employee in California between September
13 of 2019 to July of 2021. At all times during my employment, I earned an hourly wage and was entitled
14 to legally compliant meal and/or rest periods, and minimum, regular and overtime wages for all hours
15 worked. Throughout my employment, I was subject to Defendants' written policies and procedures.

16 5. I believe that my claims are typical of the claims of the Class Members that I am seeking
17 to represent because I was subject to the same alleged unlawful employment policies and practices at
18 issue in this action. Factually, Defendants' policies and practices apply class wide, and Defendants'
19 liability can be determined by facts common to all members of the Class.

20 6. Further, there is no conflict between my interests and the interests of the class that I am
21 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
22 I was injured by the same company-wide policies and practices to which the proposed Class was
23 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
24 of the Class by initiating this litigation, assisting my attorneys with the prosecution of this action, and
25 evaluating the proposed settlement to assure that it is fair.

26 7. I understood at the time that I filed this action, that as a Class Representative, I owed a
27 duty to the putative class members to faithfully prosecute this action with their best interests at the
28 forefront of every decision. I understood that I could not make any decision in this action for the sole

1 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
2 sacrifice my personal best interests for the benefit of the interests of the putative class members.
3 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
4 relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour
5 practices. I believe that I faithfully executed the duties of a Class Representative throughout this
6 litigation and will continue to do until this litigation is fully and finally resolved.

7 8. I believe that the proposed settlement before the Court is fair, reasonable and adequate,
8 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
9 humbly, I ask the Court to grant preliminary approval of the Settlement and all of its terms.

10 I declare under the penalty of perjury under the laws of the State of California that the foregoing
11 is true and correct. Executed on 07/18/2025, in San Diego, California.

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13 By: 
Natali Amaya (Jul 18, 2025 11:19 PDT)
14 NATALI AMAYA
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