

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

Kelsey Webber
Kelsey.Webber@WebberLawGroup.com
Shaelyn A. Stewart
Shaelyn.Stewart@webberlawgroup.com
WEBBER & EGBERT EMPLOYMENT LAW, P.C.
1610 R. Street, Suite 300
Sacramento, California 95811
Telephone: (916) 588-0683

Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SONOMA**

THALIA MARAVILLA, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

LCS COMMUNITY EMPLOYMENT LLC,
an Iowa limited liability LCS; and DOES 1
through 50, inclusive,

Defendants.

Case No.: SCV-270452

**DECLARATION OF PLAINTIFF
THALIA MARAVILLA IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: March 12, 2025
Time: 3:00 p.m.
Dept.: 17

Complaint Filed: March 23, 2022
Trial Date: None

1 I, Thalia Maravilla, declare as follows:

2 1. I am an individual over the age of 18 years old and am a resident of California. I
3 am one of the named plaintiffs in this matter. I have personal knowledge of the facts set forth
4 below and if called to testify I could and would do so competently.

5 2. From approximately March 2021 to December 2021, I was employed by
6 Defendant LCS Community Employment LLC (“Defendant” or “LCS”) as a Certified Nursing
7 Assistant. For the duration of my employment with the LCS, I was an hourly-paid, non-
8 exempt employee.

9 3. I filed this lawsuit because I was concerned that I was not paid properly for all
10 the hours that I worked. During my employment, LCS required that all employees (including
11 myself) submit to daily COVID-19 screening procedures, such as temperature checks and
12 questionnaires, prior to clocking in for work. Based on my experience and personal
13 observations, I estimate that on average, employees spent between two to three minutes
14 waiting in line and submitting to the screening. I was not paid any applicable minimum wages
15 and/or overtime for these check in procedures.

16 4. As a result of the unpaid minimum and overtime wages, I believe that the wage
17 statements provided to me displayed inaccurate wage rates, total hours worked, and net and
18 gross wages earned.

19 5. By filing a class action, I hoped that I might be able to change LCS’ policies to
20 better protect the working conditions of all workers, including my former co-workers.
21 However, I did not make the decision to file a class action lightly.

22 6. I was concerned by the attention that a class action lawsuit would attract in the
23 workplace and the reputational harm that may result, including the perception that I am
24 difficult to work with. I was also mindful that filing a class action lawsuit could jeopardize my
25 employment status. Although the lawsuit is justified, my current or prospective employer
26 might find out that I sued LCS, and there is a risk of facing retaliation and strained
27 relationships with colleagues and supervisors. Nevertheless, I felt that important rights were at
28 stake that hurt everyone, and something ought to be done about it.

1 7. As a class representative, I understand that it is my responsibility to act in the
2 best interests of the class and not my own. I have not put my own interests ahead of that of the
3 class. Moreover, I am not aware of any conflicts that exist between my interests and the
4 interests of the class that would impair or affect my ability to serve as representative for the
5 class.

6 8. I made it a priority to be actively involved because I wanted to do everything I
7 could to assist my attorneys in prosecuting this case. I also understood it was my duty as a
8 Class Representative to represent the best interests of the class, know about the lawsuit, help
9 my attorneys, and keep updated on the case.

10 9. I have invested a lot of personal time and energy while this lawsuit has been
11 pending. I estimate that I invested approximately 10 to 15 hours in this case, including time
12 spent: (1) participating in numerous telephonic meetings with my attorneys and their staff to
13 discuss the case and review documents prepared on my behalf; (2) providing my attorneys
14 with information and documents relevant to the COVID-19 screenings; (3) making myself
15 available by telephone during the mediation; (4) reviewing and executing the Joint Stipulation
16 of Class Action Settlement (“Settlement Agreement” or “Agreement”); and (5) reviewing and
17 signing the declarations submitted to this Court in support of the settlement.

18 10. I read the Settlement Agreement and I discussed its terms with my attorneys. I
19 believe that this settlement is fair, adequate, and reasonable. I am glad that I had the
20 opportunity to represent the class in this lawsuit and that I was able to recover money through
21 a settlement for the class.

22 11. I understand that the Settlement Agreement provides an Enhancement Payment
23 in the amount of \$10,000. I respectfully request that the Court award the full amount of the
24 Enhancement Payment. Based on my involvement in this case and the benefits provided to my
25 former co-workers, I can say I helped stand up for the other workers who were too afraid to
26 say anything to management because they did not want to risk losing their jobs or risk the
27 stigma of suing an employer. I was not afraid to take that risk because I strongly care about
28 helping out my former co-workers.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed on this 14 day of February 2025, at Santa Rosa, California.

4 *Thalia Maravilla*

5 ID xkEsxzzAUoKsJx4FRCxVReT4

6 Thalia Maravilla
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28