

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)

jlapuyade@jcl-lawfirm.com

Sydney Castillo Johnson (State Bar #343881)

scastillo@jcl-lawfirm.com

John L. Nitti (State Bar #330752)

jnitti@jcl-lawfirm.com

Carolina Faccin (State Bar #340855)

cfaccin@jcl-lawfirm.com

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 599-8292

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)

shani@zakaylaw.com

Jaclyn Joyce (State Bar #285124)

jaclyn@zakaylaw.com

5440 Morehouse Dr., Suite 3600

San Diego, CA 92121

Telephone: (619) 255-9047

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MERCED

GUILLERMINA FUENTES, individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act,

Plaintiff,

vs.

CASTLE FAMILY HEALTH CENTERS,
INC., a California corporation; and DOES 1
through 100, inclusive;

Defendants

Case No: 22CV-02080

**DECLARATION OF PLAINTIFF
GUILLERMINA FUENTES IN SUPPORT
OF PLAINTIFF'S MOTION FOR
APPROVAL OF REPRESENTATIVE
SETTLEMENT**

Date: December 4, 2025

Time: 8:15 a.m.

Judge: Hon. Stephanie L. Jamieson
Dept.: 8

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3 I, GUILLERMINA FUENTES, declare as follows:

4 1. I am a party to this action and reside in the State of California. I am fully competent
5 to make this declaration. I have personal knowledge of the facts set forth herein, except for those
6 stated on information and belief, and as to those I am informed and believe them to be true. If called
7 upon to testify, I could and would testify as set forth herein.

8 2. I make this Declaration in support of Plaintiff's Motion for Approval of
9 Representative Action Settlement.

10 3. I was employed by defendant Castle Family Health Centers, Inc. ("Defendant"), as a
11 non-exempt, hourly-paid employee from approximately 2004 to May 2021.

12 4. Throughout my employment with Defendant, I am informed and believe that myself
13 and other non-exempt, hourly-paid employees of Defendant were not paid all wages owed because
14 we were not paid for all time under Defendant's control, or for which we were suffered or permitted
15 to work by Defendant. In addition, I am informed and believe we were not paid all overtime hours
16 worked at the overtime rate of pay owed due to, without limitation, failure to record all time worked
17 and failure to pay for off-the-clock work.

18 5. During my employment with Defendant, I often took meal periods that were after the
19 fifth hour, short, or not duty-free. I witnessed other non-exempt, hourly-paid employees with my job
20 duties often taking meal periods that were after the fifth hour, short, or not duty-free, as well.

21 6. I do not recall receiving any premium pay for the full, timely and uninterrupted meal
22 periods I was not provided an opportunity to take and am informed and believe that my coworkers
23 were not provided premium pay for not being provided with the opportunity to take full, timely and
24 uninterrupted meal periods either.

25 7. I do not believe I was provided with opportunities to take full, uninterrupted 10-minute
26 rest periods while working with Defendant and am informed and believe my coworkers were not
27 provided with such an opportunity, either.

28 8. I do not recall receiving any premium pay for the full rest breaks I was not provided

1 an opportunity to take and am informed and believe that my coworkers were not provided premium
2 pay for not being provided with the opportunity to take full, uninterrupted 10-minute rest periods,
3 either.

4 9. Before and during the course of litigation, I was actively involved in assisting my
5 attorneys to support the wage and hour claims asserted. My involvement began before the initial
6 complaint was filed wherein, I provided first-hand knowledge and documentation as to Defendant's
7 practices, its ownership and corporate structure, and their wage and hour policies and practices.

8 10. Part of the information I relayed was with regard to Defendant's timekeeping policies
9 and practices, and their meal and rest period policies and practices.

10 11. I provided my attorneys with all the documentation provided to me by Defendant
11 during my employment.

12 12. I assisted in reviewing time and payroll records with my attorneys and informed them
13 of Defendant's employment policies and whether those policies matched Defendant's practices.

14 13. My attorneys called me to ask me questions over several times throughout the
15 litigation and I contacted my attorneys several times to stay updated on the case and offer my
16 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
17 during which I was available to be called to answer the questions posed by the mediator regarding
18 the asserted claims, as well as arguments raised by Defendant. In addition, I worked with my attorneys
19 over the next several months after mediation to understand and execute a long form settlement
20 agreement.

21 14. Over the past few months since the mediation has been resolved, I have stayed in touch
22 with my attorneys to ensure that there was no undue delay in payment for other aggrieved employees
23 for whom I brought this Action.

24 15. I believe that, through the present, I have spent at least 22 hours in connection with
25 this matter, which included time spent having preliminary calls with my attorneys; doing an intake
26 with my attorneys; time spent searching for documents relating to my employment; time spent
27 reading and understanding the Settlement Agreement; time spent answering calls to discuss
28 Defendant's timekeeping, pay, meal and rest periods, and to review time and payroll records; time

1 spent discussing with my attorneys on Defendant's policies and practices; time spent on-call at
2 mediation; and time spent checking in on the status of the case, among other things. I also spent time
3 preparing this declaration to support Plaintiff's Motion for Approval of Representative Action
4 Settlement.

5 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
6 rights of other employees who suffered from the same unfair wage practices. I felt that current
7 employees might not want to share their experiences with Defendant since they feared losing their
8 jobs. This is certainly understandable as I, too, have to provide for myself and others.

9 17. By bringing this lawsuit, I have put the interests of the aggrieved employees ahead of
10 my own.

11 18. I understood that I could possibly earn a small enhancement if this case is resolved
12 favorably. I also knew that I could face retaliation from Defendant and backlash from former
13 coworkers who are loyal to Defendant.

14 19. I have also had to provide a general release of claims to Defendant as part of the
15 settlement. My understanding, in addition, is that if I brought this case individually, I may have earned
16 more compensation individually and on a much quicker timeline than the timeline to resolve this
17 Action.

18 20. My goal in bringing this lawsuit was to obtain a recovery on behalf of the aggrieved
19 employees and, even more importantly, to put an end to what I believe are illegal practices on the
20 part of Defendant. I believe I have achieved both through this lawsuit and settlement.

21 21. I understand the obligations of adequately representing the non-exempt, hourly paid
22 employees of the Defendant.

23 22. I understand the substantial burden I will have to undertake in order to represent the
24 non-exempt, hourly paid employees of the Defendant.

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26 I declare under penalty of perjury under the laws of the State of California that the foregoing is
27 true and correct this 24 day of October 2025, at Delhi (city), California.
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Guillermina Fuentes (Oct 24, 2025 12:27:29 PDT)

GUILLERMINA FUENTES