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*Attorneys for Plaintiff Cynthia Wood
and all others Similarly situated*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN JOAQUIN

CYNTHIA WOOD, an individual; on behalf
of himself and all others similarly situated,

Plaintiff,

v.

MAXIM HEALTHCARE STAFFING, INC.;
and DOES 1 through 10, inclusive,

Defendants.

Case No.: STK-CV-UOE-2022-0006312

*[Assigned for all purposes to the Hon.
Barbara A. Kronlund, Dept. 10D]*

**DECLARATION OF CYNTHIA WOOD
IN SUPPORT OF PLAINTIFF' S
MOTION FOR APPROVAL OF
PRIVATE ATTORNEYS GENERAL
ACT SETTLEMENT AND FOR
AWARD OF ATTORNEYS' FEES
AND COSTS**

*[Filed concurrently with the motion for
approval of private attorneys general act
settlement and for award of attorneys' fees
and costs; Declaration of Joshua H. Haffner;
[Proposed] Order]*

Hearing Dates:
February 5, 6, 10, 11 or 12 of 2026
Hearing Time:
09:00 a.m.

Complaint Filed On: July 22, 2022

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DECLARATION OF CYNTHIA WOOD

I, Cynthia Wood, declare as follows:

1. I am the named Plaintiff in this action against Defendant Maxim Healthcare Staffing, Inc. (“Defendant”) entitled *Cynthia Wood vs Maxim Healthcare Staffing, Inc.*, Superior Court of State of California, at the County of San Joaquin, Case No. STK-CV-UOE-2022-0006312. I submit this declaration in support of Plaintiff’ s Motion For Approval Of Private Attorneys General Act Settlement And For Award Of Attorneys’ Fees And Costs.

2. I am over 18 years of age. I make this declaration from my own personal knowledge, and if called upon, could and would competently testify to the following fact

3. I have worked for Defendant during the PAGA period alleged in the complaint.

4. I understand that I am one of the named representatives in this action. I understand the claims asserted in this action on behalf of the aggrieved employees is that Defendant failed to properly pay me and other employees their regular rate of pay for overtime, failure to provide meal and rest breaks by Defendant, and associated labor violations.

5. I know of no reason that my interests in this action are inconsistent with the interests of any other aggrieved employee.

6. I am very happy about the results of this litigation. I am satisfied that Defendant is compensating me for my individual claims and each PAGA Member will receive a monetary payment in proportion to the amount of time that they worked for Defendants.

7. As a named plaintiff and purported PAGA representative, I am requesting an incentive payment in the amount of \$15,000.00.

8. During the course of this litigation, up through and following the settlement process, I kept actively involved with its status, tracking the status of the case and participating as much as possible, including assistance to my attorneys through discovery and the mediation which included providing documents pertaining to the compensation system and answering questions.

9. I have communicated with my attorneys several times per month to track my case' s status. I have taken an active involvement in this matter throughout its course, including assistance to my attorneys through discovery and the mediation.

10. This lawsuit may result in reputational harm to me. There can be stigma associated with suing anyone, let alone your former employer. I may be adversely affected when it comes to obtaining future employment – employers who learn that I sued Defendant in a PAGA action will likely avoid hiring me.

11. I have willingly participated in the action as the named plaintiffs and I will continue to do so as long as this case is pending. I volunteered to represent the other PAGA members in this case so that they can benefit from my attempt to enforce California law.

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

Executed on this 8th day of January, 2026 at Stockton, California.

Cyprus A. Wood

Cynthia Wood