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Attorneys for Plaintiffs

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

SOCORRO OCHOA, ANA GAYTAN  
GARCIA, TERESA GONZALEZ VEGA,  
LILIANA J. MOISEN, ANDREA GARCIA  
CERVANTES, and CECILIA CERVANTES,  
individually, and on behalf of all others similarly  
situated; ANA GAYTAN GARCIA and  
TERESA GONZALEZ VEGA, on behalf of the  
State of California and other aggrieved persons,

*Plaintiffs,*

v.

LA TAVOLA, LLC, a California limited  
liability company; BBJ RENTALS INC., a  
corporation; and DOES 1 through 10, inclusive,

*Defendants.*

Case No.: 22CV000862

**CLASS & REPRESENTATIVE ACTION**

**DECLARATION OF PLAINTIFF  
CECILIA CERVANTES IN SUPPORT OF  
PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

**DECLARATION OF PLAINTIFF CECILIA CERVANTES**

I, Cecilia Cervantes, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of La Tavola, LLC and BBJ Rentals Inc. (collectively, "Defendants"). I worked for Defendants from approximately February 2018 to approximately December 2019 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendants' policies and practices that have been alleged as unlawful in the First Amended Class & Representative Action Complaint.

4. I joined this lawsuit because I was worried that I was not being paid properly, and I was not provided all of my meal and rest breaks.

5. By joining this lawsuit, I hoped that I might be able to change Defendants' policies to better protect the working conditions of the absent class members.

6. I have put a lot of time and energy into this matter. As detailed more fully below, I have spent approximately 25-30 hours on this case. I made it a priority of mine to be actively involved because I wanted to do everything I could to assist my attorneys and fellow plaintiffs in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information. I also spent time looking for documents relevant to the case to send to my attorneys. I spent numerous hours looking for these documents, including when I first contacted my attorneys, before my attorneys filed the case, and before my case was mediated.

8. On the day of mediation, I made myself fully available and was in continuous contact with my attorneys to assist with any questions or issues that may have arisen.

9. I would recommend that the Court approve the settlement because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had the opportunity to represent the class in this lawsuit and that I was able to recover money through a settlement for the class.

10. I also understand that there was financial risk in bringing this lawsuit. For example, I knew that if I did not prevail in this lawsuit that I could potentially be responsible for Defendants' attorneys' fees and costs. Regardless, I wanted to help my former co-workers and change Defendants' policies and practices for the better.

11. I understand that the settlement agreement provides a service payment to me in the amount of \$5,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, I have entered into a general release, which I understand is broader than the release the class members will be bound to. I am receiving no compensation additional to that provided for in the settlement.

12. I reviewed (and ultimately signed) the Class Action and PAGA Settlement Agreement in full and my attorneys answered all the questions I had.

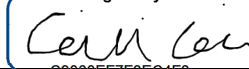
13. I have no conflicts of interest with any class member or the Settlement Administrator, ILYM Group, Inc.

14. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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

Executed on 12/30/2024, at vallejo, California.

DocuSigned by:

  
Cecilia Cervantes

**PROOF OF SERVICE**

*Ochoa v. La Tavola, LLC, et al.*  
22CV000862

STATE OF CALIFORNIA            )  
                                                  ) ss  
COUNTY OF ORANGE            )

I, Zeyra Ceballos, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 15707 Rockfield Blvd., Suite 250, Irvine, California 92618. My electronic service address is zeyra.ceballos@wilshirelawfirm.com.

On **December 30, 2024**, I served the foregoing **DECLARATION OF PLAINTIFF CECILIA CERVANTES IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

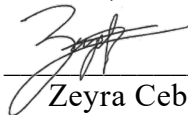
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Telephone: (415) 490-9000  
Facsimile: (415) 490-900

Attorneys for Defendants

- (X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor & Workforce Development Agency Online Filing Site.
- (X) **BY E-MAIL:** I hereby certify that this document was served from Irvine, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

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

Executed on **December 30, 2024** at Irvine, California.

  
\_\_\_\_\_  
Zeyra Ceballos