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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

NICKY JAMES MALDONADO,
individually, and on behalf of other members
of the general public similarly situated;
EDITH ROJAS, individually, and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

MARAVILLA FOUNDATION, a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 23STCV10424

Honorable William F. Highberger
Department 10

CLASS ACTION

**DECLARATION OF EDITH ROJAS
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

Hearing Date: April 1, 2026
Hearing Time: 11:30 a.m.
Department: 10

Complaint Filed: May 9, 2023
FAC Filed: June 12, 2025
Trial Date: None Set

DECLARATION OF EDITH ROJAS

I, Edith Rojas hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Maravilla Foundation (“Defendant”) from approximately October 2023 to approximately April 2024 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff and a PAGA representative. Prior to adding my claims to this case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff and PAGA representative.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout this matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent time speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the Settlement Agreement and discussed the questions I had regarding the potential settlement with my attorneys before signing the settlement papers.

6. I think my efforts helped to get the result obtained in this matter, and as a potential PAGA representative, I respectfully request that the Court award me a PAGA representative service payment for my efforts in pursuing and participating in this matter, as well as my broader release of claims. Taking into consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and aggrieved employee.

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

01/21/2026

Executed on this ____ day of January 2026, at Los Angeles, California.

Electronically Signed 2026-01-22 01:27:00 UTC - 172.58.211.53
Nintex AssureSign® ac6ecc7b-8fad-485b-9ee9-b3da00155e99

Edith Rojas