

Joanna Ghosh (SBN 272479)  
Brian St. John (SBN 304112)  
Erica Stepanian (SBN 362054)  
**LAWYERS for JUSTICE, PC**  
450 North Brand Blvd., Suite 900  
Glendale, California 91203  
Tel: (818) 265-1020 / Fax: (818) 265-1021

*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 NICKY JAMES  
MALDONADO 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 NICKY JAMES MALDONADO**

I, Nicky James Maldonado 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 May 2009 to approximately July 2020 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 class representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class 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

1 policies, practices, and procedures of Defendant.

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

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

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

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

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

01/22/2026

18 Executed on this \_\_\_\_ day of January 2026, at El Monte, California.

19   
20 [Electronically Signed: 2026-01-22 20:08:07 UTC - 172.56.235.43]  
Nintex AssureSign® 7b868567-190c-4d9a-871a-b3da0015128f

Nicky James Maldonado