

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
Maria Halwadjian (SBN 358015)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

*Attorneys for Plaintiffs Efiong Alize McKelvy
and Guadalupe Citlalli Saldana Ponce*

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

EFIONG ALIZE MCKELVY and
GUADALUPE CITLALLI SALDANA
PONCE, individually, and on behalf of the
general public similarly situated, and on behalf
of other class members and aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiff,

vs.

PBC SOLUTIONONE, INC., a California
corporation; CCS FACILITY SERVICES –
FRESNO, INC., a California corporation; CCS
FACILITY SERVICES – ORANGE
COUNTY, INC., a California corporation; CCS
FACILITY SERVICES – LOS ANGELES,
INC., a California corporation; CCS
FACILITY SERVICES – SAN DIEGO, INC.,
a California corporation; CCS LOS ANGELES
JANITORIAL, INC., a California corporation;
CCS ORANGE COUNTY JANITORIAL,
INC., a California corporation; CCS SAN
DIEGO JANITORIAL, INC., a California
corporation; CCS ENGINEERING LOS
ANGELES, INC., a Delaware corporation;
CCS ENGINEERING ORANGE COUNTY,
INC., a Delaware corporation; CCS
ENGINEERING SAN DIEGO, INC., a
Delaware corporation; CCS ENGINEERING
FRESNO, INC., a Delaware corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 23CECG03633

Honorable Jonathan M. Skiles
Department 503

CLASS ACTION

**DECLARATION OF GUADALUPE
CITLALLI SALDANA PONCE IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date:	October 20, 2026
Time:	3:30 p.m.
Department:	503

Complaint Filed:	September 5, 2023
FAC Filed:	October 23, 2025
Trial Date:	None Set

DECLARATION OF GUADALUPE CITLALLI SALDANA PONCE

I, **Guadalupe Citlalli Saldana Ponce**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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 CCS Facility Services-Orange County, Inc. ("CCS") from approximately June 2022 to approximately October 2024 as an hourly-paid, non-exempt administrative employee in the Orange County branch. My primary job duties involved helping onboard new employees, who are mostly janitors and day porters, greeting applicants and others, and assisting with resolving timekeeping, pay, and other issues for employees. Sometimes there would be issues with timekeeping devices not working so I would help with reporting employee time to the payroll department. Because I assisted with onboarding, which involved having new hires sign company policies and prepare new hire paperwork, I know that the same policies, employee handbook, and new hire documents were given to all new hires. In my role, I became very familiar with CCS' operations and that the majority of its workforce are janitors, engineers, and day porters (with the janitors assigned to clean at customer sites at night and the day porters assigned to clean at customer sites during the day). CCS generally assigned specific amounts of time to each assignment. I know that at times employees would complain that they could not complete all of the work within the allotted amount of time or complain that they did not have time to take breaks. At times they also would use their personal phones to send messages about work matters.

3. I was given the same policies as other employees, including policies on timekeeping and meal and rest breaks. At times, I was not able to take all of my meal and rest breaks. I experienced missed and late meal breaks about a couple times a month because the company was understaffed and new employees needed to be onboarded. I also had short meal breaks a couple times a week due to understaffing. My meal breaks and rest breaks were also interrupted a lot because I was asked questions about work by the office manager. Occasionally,

1 I also worked off the clock when asked to stay and help with paperwork that could take 15
2 minutes to an hour. Based on my experience with other employees and from working with the
3 office manager, I understand other employees also had similar experiences as I did in regards to
4 short, interrupted, and missed meal and rest breaks.

5 4. I decided to seek legal advice about my work experiences with CCS and about
6 pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I
7 wanted to do whatever I could to make sure CCS was held accountable for not properly
8 compensating its employees for all hours worked, non-compliant meal and rest breaks, and
9 failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice,
10 PC discussing my situation, complex wage-and-hour class actions and representative actions
11 under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named
12 plaintiff, class representative, and a PAGA representative. Prior to joining the case, I was
13 informed of and came to understand what my duties and responsibilities would be as a plaintiff,
14 a PAGA representative, and also, if class certification were to be obtained and if I were to be
15 appointed as a representative of the class, what my duties and responsibilities would be in that
16 event.

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

25 6. Throughout this matter, I was available to answer any questions my attorneys had,
26 and available to speak and meet with my attorneys whenever they needed me. I responded to
27 them as quickly as possible and gave them as much information and identified as many
28 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 CCS.

7. 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.

8. I understand that a settlement has been reached in my case and what my duties and responsibilities are as a class and PAGA representative. For example, I am aware that if the settlement is granted preliminary approval, the Court will certify a class for settlement purposes, and likely appoint me as the representative of the class and my attorneys as counsel for the class. I also understand that my duties will include checking in on, monitoring, and conferring with my attorneys to facilitate the notice and settlement administration process, and to provide information that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate. Further, if any individuals who are potential class members contact me, I will take steps to have them referred to the Court-appointed settlement administrator so that these individuals may receive the necessary information and notice they may be eligible to receive in connection with the settlement and contemplated final approval hearing.

9. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and pursue relief on behalf of other class members and the State of California with respect to aggrieved employees. I have volunteered to represent and champion the interests of many other people with similar claims and injuries because of the importance of the case and the necessity that all class members and aggrieved employees benefit from the lawsuit equally. I understand that as a proposed class representative, and if formally appointed as a class representative, I have and continue to represent the interests of all members of the class in litigation to recover relief for the class. As an hourly-paid, non-exempt employee of CCS who was subject to the same policies, practices, and procedures as the other members of the class, I have claims that are typical of those of the class. I consider the interests of the class just as I would consider my own interests. I understand that I may need to put the interests of the class before my own interests, although I have no reason to believe that

my interests are in conflict with the interests of the class. I understand that any resolution of the lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have participated, and continue to participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that I have retained.

10. I believe that the members of the Class in this case are similarly situated with respect to the issues in this case because they have the same or similar experiences regarding CCS's common course of conduct and employment and operations practices, policies, and procedures. I also believe that my experience working for CCS reflected the typical experience of other hourly-paid, non-exempt employees who I worked with.

11. I believe I have no interests which are inconsistent with the interests of the Class and I will adequately represent the Class. I brought this lawsuit on behalf of myself and other putative class members to rectify legal wrongs I believe were being committed by CCS. Based on my experiences during my employment by CCS, including those discussed above, the legal and factual issues for the Class are typical of my own legal and factual issues.

12. As a named plaintiff, I have always considered the interests of the Class as well as the State of California just as I would consider my own interests. I have and will continue to actively participate in the lawsuit as necessary, helping in any way I can. I recognize and accept that any resolution of this lawsuit is subject to court review and court approval and must be reasonable as well as fair and in the interests of the Class and the State of California. Should there be a situation in this case where I must put the interests of the Class and the State of California before my own interests, as it pertains to the claims being pursued by way of this case, I will do so.

13. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a potential class and PAGA representative, I respectfully request that the Court award me a service payment for my efforts in pursuing and participating in this case, 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.

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

15. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a service payment, 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.

09/28/2026

Executed this ____ day of September 2026, at Fontana, California.

Electronically Signed
2026-09-28 20:26:18 UTC - 172.112.224.200
Nintex AssureSign®
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Guadalupe Citlalli Saldana Ponce