

Benjamin H. Haber (SBN 315664)  
benjamin.haber@wilshirelawfirm.com  
 Daniel J. Kramer (SBN 314625)  
daniel.kramer@wilshirelawfirm.com  
 Chase M. Stern (SBN 290540)  
chase.stern@wilshirelawfirm.com  
 Trenten Bilodeaux (SBN 332692)  
trenten.bilodeaux@wilshirelawfirm.com  
**WILSHIRE LAW FIRM, PLC**  
 660 South Figueroa Street, Sky Lobby  
 Los Angeles, California 90017  
 Telephone: (213) 381-9988

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 FOR THE COUNTY OF LOS ANGELES**

ADRIAN ANDERSON, BRANDY TRUJILLO,  
 ALYSSA TRUJILLO, KERRI BYERS,  
 ARSHANE TYERRA KING, MISTA LA SHEA  
 JOHNSON, EUGENA YOLANDA RICHARD,  
 and DANIELA HERNANDEZ, individually, on  
 behalf of all others similarly situated, the State of  
 California, and other aggrieved employees,

Plaintiffs,

v.

PRESTIGE SENIOR LIVING, L.L.C., a Limited  
 Liability Company; PRESTIGE CARE, INC., a  
 corporation; LANCASTER VENTURES, L.L.C.,  
 a Limited Liability Company; PRESTIGE  
 ASSISTED LIVING AT LANCASTER, an  
 unknown entity; CHICO VENTURES, L.L.C., a  
 Limited Liability Company; MANTECA  
 VENTURES ALF, L.L.C., a Limited Liability  
 Company; MARYSVILLE VENTURES, L.L.C.,  
 a Limited Liability Company; OROVILE  
 ASSISTED LIVING, L.L.C., a Limited Liability  
 Company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23STCV15087

*[Assigned for all purposes to Hon. Theresa  
 M. Traber, Dept. 1]*

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

Preliminary Approval Hearing:

Date: January 7, 2027

Time: 10:30 a.m.

Dept.: 1

Complaint filed: June 28, 2023

FAC filed: July 6, 2026

Trial date: Not set

**DECLARATION OF ALYSSA TRUJILLO**

I, Alyssa Trujillo, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Prestige Senior Living, L.L.C., Prestige Care, Inc., Lancaster Ventures, L.L.C., Prestige Assisted Living at Lancaster, Chico Ventures, L.L.C., Manteca Ventures Alf, L.L.C., Marysville Ventures, L.L.C., and Oroville Assisted Living L.L.C. (collectively, the “Defendants”) as a non-exempt employee from approximately December 2022 to February 2023.

3. Based on my experience and knowledge of Defendants’ wage and hour policies and my familiarity with their employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other non-exempt employees of Defendants.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of Defendants. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Defendants’ company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Defendants.

**Risks, Both Financial and Otherwise, Faced in Bringing the Suit**

7. Further, when I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendants and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself,

1 but also for other employees who worked for Defendants, and that by doing so, I would be delaying  
2 more immediate recovery available to me through the Labor Commissioner's office.

3 8. I was also made aware that being a class representative and private attorney general  
4 in an action filed on behalf of others would subject me to a stigma that is sometimes associated with  
5 those who bring these kinds of lawsuits. I was aware that, as a class representative and private  
6 attorney general, I might be responsible for some or all of Defendants' legal costs if the case was not  
7 successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act  
8 on behalf of the other employees and the State of California, but I was nervous about losing and  
9 having a judgment filed against me for costs or losing job opportunities in the future.

10 9. I understood that there were risks involved in class and representative action lawsuits.  
11 I understood that the lawsuit could continue for several years and require my services and attention  
12 throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be  
13 further delayed by appeals.

#### 14 **Notoriety and Personal Difficulties Encountered**

15 10. As a named plaintiff, I am the face of the litigation. As of the date of this declaration,  
16 the class notice will be mailed in this case to approximately 1,132 current and former employees of  
17 Defendant, which will inform them that I filed class and representative actions against Defendant.  
18 Exposing myself to this kind of publicity creates a risk for my future career prospects, since current  
19 and former employees of Defendant may move to different companies within the industry or may  
20 know people at other companies within the industry who may not wish to hire someone who sued  
21 her employer. I also understand that having filed this lawsuit in court means that there is now a  
22 permanent public record of this lawsuit available to the general public. Given this additional  
23 exposure, there is further risk to my future career prospects.

#### 24 **Amount of Time and Effort Spent and Duration of the Litigation**

25 11. I have always kept the best interests of the other non-exempt employees in mind while  
26 performing my duties as the named plaintiff in this case. I have been committed throughout the  
27 course of this case to vigorously prosecuting this case on behalf of myself and the other employees.  
28 I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid

non-exempt employees by initiating these lawsuits and have spent a substantial amount of time and effort on this litigation. My work on this case has specifically included, among other things, searching for and gathering my employment documents to provide to my attorneys, providing information to my attorneys regarding my experiences working for Defendants, keeping in regular contact with my attorneys regarding the status of the case, helping my attorneys prepare for mediation, being on-call for my attorneys on the date of mediation in case questions or concerns arose during mediation, and participating in settlement discussions. After mediation, I remained actively involved by reviewing the settlement papers and contacting my counsel for updates. I estimate that since I retained my counsel in May 2023. I have spent approximately 45 hours on the activities described above. And I estimate that I will spend an additional 1-3 hours assisting my attorneys through the approval process and staying up to date with the case through disbursement of the settlement checks.

#### **Personal Benefit Received as a Result of the Litigation**

12. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, who are only releasing the wage and hour claims asserted in the lawsuit, I have signed a general release of claims as to Defendant.

13. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

#### **No Conflicts**

14. I do not have any actual or potential conflicts of interest with Class Members or the proposed Administrator, Apex Class Action.

15. I do not have any actual or potential conflicts of interest with the Cy Pres Recipient, Community Law Project.

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

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

Executed on 8/31/2026, at Lancaster, California.

DocuSigned by:



4F2CD0871AD2495  
Alyssa Trujillo

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28