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ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

04/07/2025
Clerk of the Court
BY: JUDITH NUNEZ
Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

ANA GONZALEZ, individually, and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

v.

PLANNED COMPANIES, an unknown
business entity; PLANNED LIFESTYLE
SERVICES, LLC, an unknown business
entity; PLANNED LIFESTYLE
SERVICES, INC., a New Jersey
corporation; PLANNED BUILDING
SERVICES, INC., a New Jersey
corporation; PLANNED BUILDING
SERVICES, LLC, an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

CLAUDIA PALACIOS, individually, and on
behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act,

Plaintiff,

v.

PLANNED COMPANIES, an unknown
business entity; PLANNED LIFESTYLE
SERVICES, LLC, an unknown business
entity; PLANNED LIFESTYLE
SERVICES, INC., a New Jersey
corporation; PLANNED BUILDING

Case No.: CJC-23-005283

Includes Case Nos.: CGC-22-603352, CGC-23-
607548

Honorable Jeffrey S. Ross
Department 606

**SUPPLEMENTAL DECLARATION OF
CLAUDIA PALACIOS IN SUPPORT OF
PLAINTIFFS' MOTION FOR APPROVAL OF
PRIVATE ATTORNEYS' GENERAL ACT
(CAL. LABOR CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND AWARD
OF ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE FEES, AND PAGA
SETTLEMENT ADMINISTRATION COSTS**

Hearing Date: April 16, 2025
Hearing Time: 10:00 a.m.
Department: 606

SERVICES, INC., a New Jersey corporation; PLANNED BUILDING SERVICES, LLC, an unknown business entity; PLANNED SECURITY SERVICES, INC., an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

1 **SUPPLEMENTAL DECLARATION OF CLAUDIA PALACIOS**

2 I, **CLAUDIA PALACIOS**, hereby declare as follows:

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

6 2. I was employed by Defendant Planned Building Services, Inc. (“Defendant”) from
7 approximately May 2022 to approximately July 2022 as a non-exempt, hourly-paid employee, as a Porter.
8 I decided to seek legal advice about my work experiences with Defendant and about pursuing my
9 grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever
10 I could to make sure Defendant paid me and other employees what was owed to us and was held
11 accountable for their practice of not properly compensating their employees for all hours worked and
12 non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative
13 action lawsuits on my own and did some research into the leading employment law firms in California
14 for approximately **1.5 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for
15 approximately **2.5 hours** discussing my situation, representative action lawsuits under the Private
16 Attorney General Act (“PAGA”), and what it meant to bring be a PAGA representative.

17 3. I have spent for approximately **10 hours** communicating with my attorneys regarding the
18 case and fulfilling my responsibilities as a PAGA representative, which included gathering documents
19 concerning my employment with Defendant reviewing documents with my attorneys, providing
20 information regarding the duties of hourly-paid and non-exempt employees, and helping develop a
21 strategy as to what documents and information to obtain from Defendant. I routinely checked in with my
22 attorneys and their staff to make sure that they had all of my most current information and any additional
23 information that I had obtained.

24 4. As the case progressed, I was available to answer any questions my attorneys had and was
25 available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly
26 as possible and gave them as much information and identified as many documents as I could. I also spent
27 at least **8 additional hours** speaking with my attorneys about the case, identifying potential witnesses,
28 providing my attorneys with documents and information concerning the case, and also describing
policies, practices, and procedures of Defendants.

1 5. As far as the settlement is concerned, I was available to review documents and answer any
2 questions my attorneys had. I spent **about 1.5 hours** reviewing the settlement agreement and **about 1**
3 **hour** asking questions and discussing the potential settlement with my attorneys before signing the
4 settlement agreement.

5 6. I understand that a settlement has been reached in my case and what my duties and
6 responsibilities are as a PAGA representative. I also understand that my duties will include checking in
7 on, monitoring, and conferring with my attorneys and counsel to facilitate the settlement administration
8 process, and to provide information that the Court needs to assess whether the settlement is fair,
9 reasonable, and adequate.

10 7. I believe that I have done everything that my attorneys have asked of me and have tried,
11 to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think
12 my efforts helped to get the result obtained in this case. I have volunteered to represent and champion the
13 interests of many other people with similar claims and injuries because of the importance of the case and
14 the necessity that all aggrieved employees benefit from the lawsuits equally.

15 8. By becoming a representative of the case, I realized I would have to devote substantial
16 time to the case, which is a scarce resource for me. That risk did come to fruition because I had to devote
17 significant time to my case, as described in the preceding paragraphs. I have not incurred financial risk
18 so far, however the risk so far is that Defendant won the case, and thus I would potentially be responsible
19 to pay Defendant's costs, which would present difficulties to me. My lawyers did take this case on a
20 contingency basis, so they shouldered the financial risk with respect to not recovering attorneys' fees and
21 having to advance case costs. Additionally, I was concerned, and continue to be concerned, about
22 potential retaliation and blacklisting, among other things, because my lawyer explained to me that this
23 case is very public and it is likely that my former coworkers and managers will find out. My case will
24 become part of the public record and it's hard to quantify the risk associated with that, but it is a serious
25 risk that I decided to take. Becoming a representative of the case caused me to suffer stress, since the
26 start of the case in January 2023. First, I did not want to repeat my experience at Planned Building
27 Services, Inc., where I was forced to find new work for less pay, which required me to work on the
28 weekends and seek additional childcare. Second, I was forced to relive my experience working for

1 Defendant. Third, I had to manage standing up to a corporation with a large amount of resources.
2 Personally, I've been empowered in this process, and think that this can maybe help others to stand up
3 and be one person that utilizes the best justice system in the world with its juries and judges. I am proud
4 of the fact that I put my interests along the side of the aggrieved employees and, with my attorneys' help,
5 I achieved this settlement, while also realizing that my share will be extremely small relative to the whole.

6 9. I understand that as a proposed PAGA representative, I have and continue to represent the
7 interests of all aggrieved employees. I have actively participated in the lawsuit since its inception, as
8 necessary, and if required, I will provide trial testimony. I understand that any resolution of the lawsuit
9 is subject to court approval, and must be in the best interest of the aggrieved employees and the State of
10 California. I have also actively followed and monitored, and continue to follow and monitor, the progress
11 of the lawsuit, and have taken steps to make sure, and continue to make sure, that the litigation is
12 prosecuted by the skilled and effective attorneys that I have retained. I believe that I have no interests
13 which are inconsistent with the interests of the aggrieved employees and that I have, and will continue
14 to, adequately represent the aggrieved employees. I think my efforts helped to get the result obtained in
15 this case.

16 10. For my broader individual waiver and release of claims with a California Civil Code
17 Section 1542 waiver (set forth in Section III(E) of the Settlement Agreement), the Settlement provides
18 for a General Release Fee in the amount of \$10,000.00, to be paid out of the Gross Settlement Amount,
19 subject to Court approval. I respectfully request that the Court award me full payment of the General
20 Release Fee. Taking into consideration the time that I have dedicated to this case, I believe that this
21 amount is reasonable.

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

23 12. I have not entered into any undisclosed agreements, nor have I received any undisclosed
24 compensation in this case. The only compensation I will receive is whatever amount the Court awards as
25 a general release fee, and my share of the settlement as an aggrieved employee.

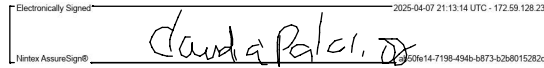
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct.

3 Executed this 04 / 07 / 25 day of April 2025, at San Francisco, California.

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5  Electronically Signed: 2025-04-07 21:13:14 UTC - 172.59.128.237
Nintex AssureSign® 950614-7198-494b-b873-b2b015282c7

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