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Attorneys for Plaintiffs

**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

**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: March 27, 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.

DECLARATION OF CLAUDIA PALACIOS

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

1. I am over 18 years of age and a resident of California. I am the 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 Defendant Planned Building Services, Inc. ("Defendant") from approximately May 2022 to approximately July 2022 as a non-exempt, hourly-paid employee, as a Porter. 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 paid me and other employees what was owed to us and was held accountable for their practice of not properly compensating their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC discussing my situation, representative action lawsuits under the Private Attorney General Act ("PAGA"), and what it meant to bring be a PAGA representative.

3. I have spent significant time communicating 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, providing information regarding the duties of hourly-paid and 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. As the case progressed, I was available to answer any questions my attorneys had and was 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 also 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 Defendants.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent considerable time reviewing the settlement agreement and asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case.

7. For my broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Section III(E) of the Settlement Agreement), the Settlement provides for a General Release Fee in the amount of \$10,000.00, to be paid out of the Total Settlement Amount, subject to Court approval. I respectfully request that the Court award me full payment of the General Release Fee.

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

9. 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 an enhancement payment, my share of the settlement as an aggrieved employee, and payment from Defendants in connection with a contemplated separate confidential individual settlement and general release agreement.

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

Executed this 02/19/25 day of February 2025, at San Francisco, California.

Electronically Signed _____ 2025-02-20 05:05:58 UTC - 172.56.47.116



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Claudia Palacios