Docusign Envelope ID: A804348A-F0A8-86D3-8351-D5B05AB0F0D9

Edwin Aiwazian (SBN 232943)
Joanna Ghosh (SBN 272479)
Brian St. John (SBN 304112)
Daniel Bass (SBN 287466)
LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

AEGIS LAW FIRM, PC
KASHIF HAQUE, State Bar No. 218672
JESSICA L. CAMPBELL, State Bar No. 280626
CAROLYN M. BELL, State Bar No. 313435
9811 Irvine Center Drive, Suite 100
Irvine, California 92618
Telephone: (949) 379-6250
Facsimile: (949) 379-6251
cbell@aegislawfirm.com

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

ALEXANDRIA PERKINS, DEVASTASIA PARKER, and HAYDEE ALCANTAR, individually, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiffs,

vs.

COVENANT CARE CALIFORNIA LLC, a California limited liability company; and DOES 1 through 100, inclusive,

Defendants.

Case No. No. 34-2023-00337015-CU-OE-GDS

Honorable Jill H. Talley
Department 23

DECLARATION OF HAYDEE ALCANTAR IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT

Reservation #:	A-337015-016
Date:	November 20, 2026
Time:	9:00 a.m.
Department:	8A

Docusign Envelope ID: A804348A-F0A8-86D3-8351-D5B05AB0F0D9

I, Haydee Alcantar, 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.

2. I make this declaration in support of my Motion for Approval of Private Attorneys General Act Representative Action Settlement.

3. I worked for Covenant Care California LLC ("Defendant") as a non-exempt employee from 2021 until 2022 in the position of Licensed Vocational Nurse.

4. During my employment, I felt Defendant failed to provide adequate meal and rest breaks to me and my fellow employees. We faced difficult working conditions, which I felt were unfair and unlawful.

5. Through my attorneys, I filed my case on June 1, 2022, on behalf of myself and all other non-exempt employees of Defendant.

6. I originally filed my case as a class and PAGA action. I chose to do so instead of pursuing my own claims in an individual case or a Labor Commissioner claim. I understood that doing so would delay my recovery and require that I place the interests of others above my own.

7. After learning of the arbitration agreement, I understood the best thing for the other employees and the State of California was to keep pursuing the representative PAGA claims. I began the arbitration process so that I could prove my own claims in arbitration and then return to Court, still facing the same or similar risks I faced with a class action case, since I would remain the face of the PAGA representative case.

8. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the State and aggrieved employees, but I was nervous about losing and having a judgment filed against me for costs, or losing job opportunities in the future.

9. I ultimately combined my case with the instant case. We mediated the two cases together and reached a settlement of the PAGA claims.

10. With respect to the work I performed on the case, I participated in many conversations with my attorneys, gathered documents to produce to my counsel, and provided information related to my working conditions and Defendants' company structure and operations.

Docusign Envelope ID: A804348A-F0A8-86D3-8351-D5B05AB0F0D9

11. Throughout the course of this case, I contacted my attorneys regularly for updates on the status of the case.

12. For mediation, I assisted my attorneys in preparation and strategy. I spoke with my attorneys about the status of the case, its strengths and weaknesses and believed that I assisted them in evaluating the claims and the potential damages for use at that mediation.

13. After mediation, I reviewed the settlement agreement and discussed the terms with my attorneys to make sure the settlement was fair.

14. Overall, I dedicated approximately 60 hours pursue the claims in this lawsuit.

15. Based on my review of the settlement terms, conversations with my attorneys, and my understanding of Defendants' operations, I believe the settlement in the case is fair and adequate and in the best interest of the employees covered by the settlement and the State of California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on 06/15/2026, 2026, in California.

Signed by:
Haydee Alcantar
50267EA3150B4EA...

Haydee Alcantar