Edwin Aiwazian (SBN 232943)
Joanna Ghosh (SBN 272479)
Brian St. John (SBN 304112)
Daniel Bass (SBN 287466)
LAWYERS *for* JUSTICE, PC
340 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.: 34-2023-00337015-CU-OE-GDS

Honorable Jill H. Talley
Department 8A

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

Reservation #:	A-337015-016
Date:	November 20, 2026
Time:	9:00 a.m.
Department:	8A
Complaint Filed:	March 27, 2023
FAC Filed:	May 16, 2023
Trial Date	None Set

DECLARATION OF ALEXANDRIA PERKINS

I, **Alexandria Perkins,** 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 Covenant Care California LLC ("Defendant") from approximately November 2021 to approximately April 2022 as a non-exempt, hourly-paid employee. 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 was held accountable for its practice of not properly compensating its 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 for approximately **4 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **6 hours** discussing my situation, representative action lawsuits under the Private Attorney General Act ("PAGA"), and what it meant to bring a PAGA Action and be a PAGA representative.

3. I have spent over **35 hours** 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 aggrieved employees, filing declarations in support of motions including in opposition to Defendant's Motion to Compel Arbitration, 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 spent at least **15 additional hours** 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 Defendant.

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

6. In total, throughout this case I would estimate that I have dedicated over 65 hours pursuing the claims in this lawsuit.

7. 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.

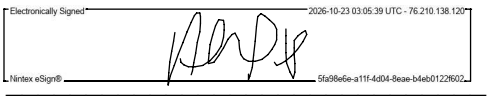
8. For my broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Section 8(b) of the Settlement Agreement), the Settlement provides for a General Release Fee in the amount of $15,000.00, to be paid out of the Total Settlement Amount, subject to Court approval. I respectfully request that the Court award me full payment of the General Release Fee.

9. I am not related to anyone associated with Lawyers *for* Justice, PC or Aegis Law Firm, PC.

10. 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 general release fee, as well as my share of the settlement as an aggrieved employee.

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

Executed on 10/22/2026, at Richmond, California.



Alexandria Perkins