

WILSHIRE LAW FIRM, PLC
660 S. Figueroa St., Sky Lobby
Los Angeles, CA 90017

WILSHIRE LAW FIRM, PLC
Thiago M. Coelho (SBN 324715)
thiago.coelho@wilshirelawfirm.com
Lauren M. Lendzion (SBN 239184)
lauren.lendzion@wilshirelawfirm.com
Jennifer M. Leinbach (SBN 281404)
jennifer.leinbach@wilshirelawfirm.com
Alan A. Wilcox (SBN 287476)
alan.wilcox@wilshirelawfirm.com
Conor J.D. Gomez (SBN 337395)
conor.gomez@wilshirelawfirm.com
660 S. Figueroa Street, Sky Lobby
Los Angeles, CA 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiffs

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

ARIELA GONZALEZ-MONTERROZA,
individually, and on behalf of all others
similarly situated,

Plaintiff,

v.

ASCEND HEALTHCARE, LLC, a California
limited liability company; and DOES 1 through
10, inclusive,

Defendants.

Case No.: 25STCV25494
Assigned to Hon. David S. Cunningham III,
Dept. 11

Complaint Filed: August 29, 2025
FAC Filed: December 10, 2025
Trial Date: Not Set

PAGA REPRESENTATIVE ACTION

**DECLARATION OF ARIELA
GONZALEZ-MONTERROZA IN
SUPPORT OF PLAINTIFF'S MOTION
TO APPROVE PAGA SETTLEMENT**

DECLARATION OF ARIELA GONZALEZ-MONTERROZA

I, Ariela Gonzalez-Monterroza, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am the named Plaintiff in this action filed pursuant to the Private Attorneys General Act (“PAGA”) and submit this declaration in support of Plaintiff’s Motion to Approve PAGA Settlement and to Enter Judgment. Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request of a \$5,000.00 service payment for my role as the PAGA Representative.

3. I am a former employee of Defendant Ascend Healthcare, LLC (“Defendant”). I worked for Defendant from approximately June 2024 to approximately July 2025 as non-exempt, hourly employee. Throughout the entirety of my employment, I was subject to Defendants’ policies and practices that have been alleged as unlawful in the complaint.

4. I filed this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, I was not provided all of my meal and rest breaks, and I was not reimbursed for all business expenses. While working for Defendants, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks and without receiving compensation for all hours worked. I also observed my co-workers working long hours without taking breaks. Furthermore, my co-workers and I were not reimbursed for all of our business expenses.

5. By representing other aggrieved employees in this lawsuit, I hoped that I might be able to change Defendants’ policies to better protect the working conditions of my co-workers. I also understood it was my duty as the PAGA Representative to represent the State of California and other aggrieved employees, know about the lawsuit, help my attorneys, and keep updated on the case.

6. Prior to commencing this case, I provided Wilshire Law Firm, PLC with a detailed account of the facts related to my employment with Defendant. Additionally, I provided my counsel with documentation in the form of pay statements that applied to my employment with

1 Defendant. Based on my conversations, my attorneys and I were able to identify instances when I
2 was not paid correctly.

3 7. I have invested a lot of personal time and energy while this lawsuit has been
4 pending. I made it a priority to be actively involved because I wanted to do everything I can to
5 assist my attorneys in prosecuting this case. I regularly communicated with my attorneys and their
6 staff via telephone, texts, and email to discuss updates on the case and to provide my attorneys
7 with additional information.

8 8. I spent multiple hours looking for documents that my attorneys asked me to provide
9 to help this case.

10 9. I also made myself available during the mediation for this case and I kept in regular
11 contact my attorneys before and after the mediation to ensure that any questions the attorneys had
12 could be answered.

13 10. I also reviewed documents filed in this case, including the settlement-related
14 documents.

15 11. I believe the settlement is a good settlement and I would recommend that the Court
16 approve it because I believe that this settlement is fair, adequate, and reasonable in view of PAGA's
17 purposes. I am glad that I had the opportunity to represent the State of California and the aggrieved
18 employees in this lawsuit and that I was able to recover penalties through a settlement for the
19 aggrieved employees. I have also observed my attorneys' work throughout this case and I believe
20 they have been thorough, diligent, prompt, courteous, and professional.

21 12. I estimate that I spent **at least 40 hours on this case** since I first contacted Wilshire
22 Law Firm, PLC.

23 13. I did not make the decision to file this representative action lightly. I was concerned
24 by the attention a lawsuit, and especially a representative action, would attract. My name would
25 be associated with a lawsuit that I filed against my former employer and I am mindful that future
26 employers might find out that I sued a former employer, which could hurt my employability. In a
27 competitive job market, this factor may weigh heavily against me.
28

WILSHIRE LAW FIRM, PLC
660 S. Figueroa St., Sky Lobby
Los Angeles, CA 90017

14. Standing up for myself and the rights of others was not an easy decision, and I am relieved that this case is coming to an end.

15. I respectfully request that the Court award me a \$5,000.00 service payment. I am receiving no additional compensation other than the compensation provided for in the settlement. Additionally, I am entering into a general release broader than that of other aggrieved employees which releases other claims I may have based on my experiences working at Defendant, which I believe may include hostile work environment and discrimination claims. Because I am sacrificing my individual claims and the potential for more monetary damages tied to those possible claims for the good of the class, I believe my service award is reasonable.

16. Based on my involvement in this case and the benefits provided to workers of Defendants, I can say I helped represent the other workers who may have been too afraid to say anything to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping my fellow co-workers.

17. Although I continue to fear that employers may find out that I participated in this lawsuit and hold it against me, I felt that important rights were at stake that hurt myself and other employees.

18. I have no conflicts of interest with any class member or the Settlement Administrator, Phoenix Class Action Administration.

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

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

Executed on 5/27/2026 at Palmdale, California.

DocuSigned by:

2BA80B7593494DC...
Ariela Gonzalez-Monterroza