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9 Attorneys for Plaintiff Teresa Carmen C. Mejia,
10 as an individual and on behalf of all employees
11 similarly situated

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

14 TERESA CARMEN C. MEJIA, as an
15 individual and on behalf of all employees
16 similarly situated,

17 Plaintiff,

18 v.

19 KF CASITAS, LLC dba CASITAS CARE
20 CENTER, a Limited Liability Company; and
21 DOES 1 through 50, inclusive,

22 Defendant.

Case No.: 23STCV06090

[Assigned for all purposes to Hon. Lawrence P. Riff,
Dept. 7]

**DECLARATION OF TERESA CARMEN C.
MEJIA IN SUPPORT OF PLAINTIFF'S
MOTION FOR AN ORDER APPROVING
SETTLEMENT OF CLAIMS BROUGHT
PURSUANT TO THE PRIVATE
ATTORNEY GENERAL'S ACT OF 2004**

Date: May 30, 2024
Time: 10 a.m.
Courtroom: Dept. 7
Judge: Hon. Lawrence P. Riff

Action Filed: March 17, 2023
Trial Date: Not Set

DECLARATION OF TERESA CARMEN C. MEJIA

I, TERESA CARMEN C. MEJIA, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter against Defendant KF CASITAS, LLC dba CASITAS CARE CENTER ("Defendant"). This declaration is submitted in support of approval of the Settlement Agreement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant as an hourly-paid, non-exempt housekeeping employee from approximately 2011 to February 22, 2023.

3. When I worked for Defendant, I was subjected to the same labor code claims involving off the clock, incorrect overtime rate, meal breaks, rest breaks, wage statements, failure to reimburse necessary business expenses and failure to pay all wages due when I was no longer an employee of Defendant as all other employees.

4. I have been actively involved in this case since I first retained Tunyan Law, APC. My participation began with bringing certain issues that are involved in this matter to my Counsel's attention and explaining the factual background that was used to prosecute the claims in this case. I have had many discussions with the attorneys at Tunyan Law, APC regarding Defendant's wage and hour policies, my claims in this case, litigation strategy, potential witnesses, updates on how the case was proceeding, and how I could help the case. For example, I remained in regular communication with my attorneys regarding mediation discovery and settlement discussions that the parties had during the course of litigation and mediation. I also provided information and documents to my attorneys to assist them in preparing the case. I also spent time reviewing and discussing the Settlement Agreement as well as other documents from my attorneys, and reviewing my own records for documents that would be potentially relevant to the case.

5. When I filed this lawsuit, I understood that this lawsuit could benefit my former co-workers, other Defendant's employees, and the State of California by helping to recover civil penalties on their behalf as a result of the alleged violations described above. I also understood that I was filing this

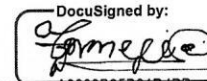
1 case as an "aggrieved employee" on behalf of myself and my fellow "aggrieved employees" as well as
2 the State of California. I do not believe that I have any conflicts with Aggrieved Employees included in
3 this proposed Settlement.

4 6. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to
5 search for information online these days, I understood I would face an increased risk that future
6 employers would discover information about this lawsuit online and had a negative reaction to learning
7 that I sued an employer. This may make it harder for me to obtain future employment or change jobs for
8 a better opportunity.

9 7. I believe that the Settlement obtained on behalf of the aggrieved employees and the State
10 of California is fair and reasonable in view of the issues and risks involved with the case.

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

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15 Executed 3/16/2024 | 8:04 PM PDT , at Van Nuys, California.

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17 DocuSigned by:


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TERESA CARMEN C. MEJIA

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

On the date indicated below, I served the document described as: **DECLARATION OF TERESA CARMEN C. MEJIA IN SUPPORT OF PLAINTIFF'S MOTION FOR AN ORDER APPROVING SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE PRIVATE ATTORNEY GENERAL'S ACT OF 2004** on the interested parties in this action by sending a true copy thereof to interested parties as follows and as stated on the attached service list:

Attorneys for Defendant KF Casitas, LLC dba Casitas Care Center

PROOF OF SERVICE