

6/22/2026 1:19:39 PM

Clerk of the Superior Court
By T. Automation , Deputy Clerk

Brooke B. Nevels (SBN 302994)
Christopher E. Nichols (SBN 316417)
NEVELS NICHOLS, LLP
10650 Treena Street, Suite 212
San Diego, CA 92131
Telephone: (619) 374-1100
Email: BNevels@NevelsNichols.com
Email: CNichols@NevelsNichols.com
Please also serve: Service@NevelsNichols.com

Attorneys for Plaintiffs

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

CIVIL UNLIMITED DIVISION

RUTH JOY SEGOVIA; FARANAK	)	CASE NO. 24CU020914C
KIANFAR; DIEMVY PHAM; LISA	)	
MATHEWS FITZGIBBONS; CYNTHIA	)	DECLARATION OF RENE AMEL
GUERRERO; and RENE AMEL PERALTA;	)	PERALTA IN SUPPORT OF MOTION
as individuals, on behalf of others similarly	)	FOR FINAL APPROVAL OF CLASS AND
situated, and on behalf other aggrieved	)	PAGA SETTLEMENT
employees pursuant to the California Private	)	
Attorneys General Act,	)	<i>Assigned for All Purposes to Dept. C-75</i>
	)	<i>Hon. Euketa Oliver</i>
Plaintiffs,	)	
	)	Date: July 17, 2026
vs.	)	Time: 9:00 a.m.
	)	Dept: C-75
	)	
ARTEMIS HEADLANDS, LLC, a	)	
Delaware corporation; MAURO	)	
ORMEDILLA, an individual; and DOES 1	)	
through 25, inclusive,	)	
Defendants.	)	

I RENE AMEL PERALTA, hereby state and declare as follows:

1. I am over the age of eighteen, a Plaintiff in both my capacity as an individual, and on behalf of others similarly situated. I submit this declaration in support of the Motion for Final Approval of Class Settlement, in support of my application for a representative enhancement award.

2. I have personal knowledge of all the facts stated herein. I could and would competently testify under oath to these facts in court if requested to do so.

**DECLARATION OF RENE AMEL PERALTA IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA SETTLEMENT**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

MY EMPLOYMENT

3. I worked for Defendant Artemis Headlands LLC (“Artemis Headlands”) in California from in or around November 2021, to October of 2023. I was classified as a non-exempt employee, while working for Artemis Headlands.

4. During my employment with Artemis Headlands, I was subjected to multiple violations of California wage-and-hour laws, including unpaid overtime, missed meal and rest breaks, and the failure to reimburse required business expenses. My position regularly required me to work twelve-hour shifts, which were typically scheduled between one and three times per week, and sometimes more depending on Artemis Headlands’ staffing and operational needs. Despite consistently working more than eight hours in a single shift, I was not paid overtime or double-time wages. I was also not permitted to take meal and rest breaks at the legally required times. On numerous occasions, I worked beyond my fifth hour before being allowed to take a meal break, or I was instructed to clock out for a meal period while continuing to work. When my shifts exceeded ten hours, I was often not provided with a second meal break. Artemis Headlands did not encourage second meal breaks, and any attempts to take one were frequently interrupted due to workload demands.

5. I was regularly required to work more than four hours without being provided a ten-minute rest period. When I worked shifts longer than eight hours, I was also not permitted to take a third ten-minute rest break. At no time did Artemis Headlands provide meal or rest break premium pay. Artemis Headlands also failed to reimburse me for necessary expenses incurred in the performance of my job duties, including required use of my personal cellular phone. Because Artemis Headlands did not properly calculate, track, or record my hours worked, I did not receive all overtime wages owed to me and did not receive accurate itemized wage statements. Based on my experience, I believe these same practices were applied to other non-exempt employees of Artemis Headlands.

MY ROLE IN THE LITIGATION

6. After experiencing these issues and discussing them with Plaintiff Ruth Joy Segovia, I retained Nevels Nichols, LLP, a law firm with experience litigating class actions and claims

1 under the California Labor Code. I have no personal or familial relationship with my attorneys
2 or any officer of the Court. I am not involved in litigation against any member of the class, and
3 my attorneys represent me only in connection with this lawsuit.

4 7. I agreed to serve as a representative Plaintiff in this action because I believed Artemis
5 Headlands violated my rights as an employee and the rights of other current and former non-
6 exempt employees. Specifically, I believe Artemis Headlands failed to pay all wages owed for
7 all hours worked and failed to compensate employees at the rates required by law.

8 8. This lawsuit was filed on October 31, 2024, after I contacted counsel to seek legal
9 assistance related to my employment with Artemis Headlands, following discussions with
10 Plaintiff Ruth Joy Segovia. My attorneys explained that this case includes claims under the
11 Private Attorneys General Act (“PAGA”) based on a PAGA notice submitted on my behalf, and
12 that I am serving as a PAGA representative. Prior to the filing of the complaint, I assisted my
13 attorneys by discussing Artemis Headlands’ policies and practices, providing documents,
14 answering questions, and coordinating with other representatives. Throughout the case, I
15 remained in contact with my attorneys, who were available whenever I needed guidance or had
16 questions.

17 9. I understood that bringing this action in a representative capacity meant I was pursuing
18 relief not only for myself, but also for other current and former employees of Artemis Headlands
19 in California. I believed many employees were unaware of their labor rights or hesitant to come
20 forward due to fear of retaliation or the burdens of litigation. I therefore devoted significant time
21 to assisting with discovery and other responsibilities in furtherance of this case.

22 10. I made myself available to participate in mediation on May 20, 2025, before Judge Cole.
23 That mediation did not result in settlement because Artemis Headlands failed to provide accurate
24 and up-to-date sampling information, which limited the ability to engage in productive settlement
25 negotiations. I later made myself available again on August 14, 2025, for a second mediation
26 with mediator Kelly Knight, where the parties reached a settlement. I discussed the settlement
27 terms with my attorneys and understood that I was representing absent aggrieved employees. I
28 sought the best possible outcome for the class and believe the settlement reached provides a

**DECLARATION OF RENE AMEL PERALTA IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA SETTLEMENT**

1 favorable and reasonable resolution. I reviewed and signed the long-form settlement agreement
2 on December 8, 2025.

3 11. I have remained actively involved in this case by staying in communication with my
4 attorneys and spending substantial time assisting with discovery and mediation. Although I did
5 not keep a contemporaneous record of my time, I estimate that I spent approximately ten (10) to
6 twenty (20) hours working on this matter to date, and I understand that additional time may be
7 required. I believe I have satisfied my obligations as a representative Plaintiff and will continue
8 to act diligently and in the best interests of the class.

9 12. In light of the time and effort I devoted to this litigation, the risks involved in bringing
10 claims against a former employer, the potential impact on my future employment opportunities,
11 the general release provided, and the overall size of the settlement, I believe a representative
12 service payment of five thousand dollars (\$5,000.00) is fair and reasonable. I also believe that
13 the individual twenty-thousand dollar (\$20,000.00) payment to Plaintiff Ruth Joy Segovia for her
14 individual Retaliation claim is both fair and reasonable.

15
16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct. Executed on June 15, 2026, at San Diego, California.

18  *Rene Amel Peralta*
19 box SIGN 18KPJ26K-1VXQXPLX

20 RENE AMEL PERALTA
21
22
23
24
25
26
27
28

**DECLARATION OF RENE AMEL PERALTA IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA SETTLEMENT**

PROOF OF SERVICE

I, the undersigned, declare that I am over the age of eighteen years and not a party to the case. My business address is 10650 Trenea Street, Suite 212, San Diego, California 92131. On Friday, June 19, 2026, I served a copy of the following documents:

- **Motion for Final Approval – Notice**
- **Motion for Final Approval – [Proposed] Judgment**
- **Motion for Final Approval – Memorandum of Points and Authorities**
- **Motion for Final Approval – Declaration of Brooke B. Nevels**
- **Motion for Final Approval – Declaration of Ruth Joy Segovia**
- **Motion for Final Approval – Declaration of Faranak Kianfar**
- **Motion for Final Approval – Declaration of Diemvy Pham**
- **Motion for Final Approval – Declaration of Lisa Mathews Fitzgibbons**
- **Motion for Final Approval – Declaration of Cynthia Guerrero**
- **Motion for Final Approval – Declaration of Rene Amel Peralta**
- **Motion for Final Approval – Declaration of ILYM Group**

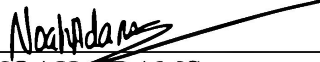
[X] By Electronic Service: Based on a court order, Code of Civil Procedure Section 1010.6 and California Rules of Court Rule 2.251, or an agreement of the parties to accept electronic service. I caused the above documents to be sent to the person(s) at the e-mail address(es) set forth below.

[] By Mail: I placed the envelope for collection and mailing at the address(es) below, following our ordinary business practices. I am readily familiar with this firm's business practice for collecting and processing correspondence for mailing, on the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at San Diego, California.

James C. Fessenden
Lauren M. Guggisberg
FISHER & PHILLIPS LLP
4747 Executive Drive, Suite 1000
San Diego, California 92121
(858) 597-9600
jfessenden@fisherphillips.com
lguggisberg@fisherphillips.com
Attorneys for Defendants

Labor and Workforce Development Agency ("LWDA") ONLY VIA ONLINE FILING:
Submitted electronically via the LWDA's online PAGA filing portal at:
<https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on Friday, June 19, 2026, at San Diego, California.



NOAH ADAMS