

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

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Attorneys for Plaintiffs

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

CIVIL UNLIMITED DIVISION

RUTH JOY SEGOVIA; FARANAK
KIANFAR; DIEMVY PHAM; LISA
MATHEWS FITZGIBBONS; CYNTHIA
GUERRERO; and RENE AMEL PERALTA;
as individuals, on behalf of others similarly
situated, and on behalf other aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiffs,

vs.

ARTEMIS HEADLANDS, LLC, a
Delaware corporation; MAURO
ORMEDILLA, an individual; and DOES 1
through 25, inclusive,

Defendants.

CASE NO. 24CU020914C

**DECLARATION OF LISA FITZGIBBONS
IN SUPPORT OF MOTION AND
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
SETTLEMENT**

*Assigned for All Purposes to Dept. C-75
Hon. James Mangione*

Date: January 23, 2026
Time: 9:00 a.m.
Dept: C-75

I LISA FITZGIBBONS, 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 the State of California as a private attorney general. I submit this declaration in support of the Motion for Preliminary Approval of Class Settlement, in support of my application for a representative enhancement award.

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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.

MY EMPLOYMENT

3. I worked for Defendant Artemis Headlands LLC (“Artemis Headlands”) in California from in or around February 2022, to June of 2024. I was classified as a non-exempt employee, while working for Artemis Headlands.

4. While employed by Artemis Headlands, I experienced repeated wage-and-hour violations, including unpaid overtime, missed meal and rest breaks, and unreimbursed business expenses. I regularly worked twelve-hour shifts, generally scheduled one to three times per week, and sometimes more depending on Artemis Headlands' needs. Despite working more than eight hours in a shift, I was not paid overtime or double-time wages. I was also not permitted to take meal or rest breaks at the legally required times. On multiple 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 I worked shifts longer than ten hours, I was often not provided with a second meal break, and Artemis Headlands did not encourage second meal periods. When I attempted to take a second meal break, it was frequently interrupted due to workload demands.

5. I was regularly required to work more than four hours without being provided a ten-minute rest break, and when I worked more than eight hours, I was not permitted to take a third rest break. At no time was I paid meal or rest break premium wages. Artemis Headlands also failed to reimburse me for necessary business expenses incurred in the course of my employment, including required use of my personal cell phone. Because Artemis Headlands did not accurately track or calculate 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 practices affected other non-exempt employees.

MY ROLE IN THE LITIGATION

6. After discussing these issues with Plaintiff Ruth Joy Segovia, I retained Nevels Nichols, LLP, a firm experienced in class action litigation and California Labor Code claims. I have no

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1 personal or familial relationship with my attorneys or any officer of the Court, and I am not
2 involved in litigation against any member of the class. My attorneys represent me only in
3 connection with this lawsuit.

4 7. I agreed to serve as a representative Plaintiff because I believed Artemis Headlands
5 violated my labor rights and the rights of other non-exempt employees. Specifically, I believe
6 Artemis Headlands failed to pay all wages owed for all hours worked and failed to compensate
7 employees at the correct rates.

8 8. I understood that by acting in a representative capacity, I was pursuing relief not only for
9 myself but also for other current and former employees of Artemis Headlands in California. I
10 believed many employees were unaware of their rights or reluctant to pursue claims due to fear
11 of retaliation or the burden of litigation. I therefore devoted significant time to assisting with
12 discovery in this action.

13 9. This lawsuit was filed on October 31, 2024, after I contacted counsel to seek legal
14 assistance related to my employment with Artemis Headlands, following discussions with
15 Plaintiff Ruth Joy Segovia. My attorneys explained that the case includes claims under the Private
16 Attorneys General Act (“PAGA”) based on a PAGA notice submitted on my behalf, and I am
17 serving as a PAGA representative. Prior to the filing of the complaint, I assisted my attorneys by
18 discussing Artemis Headlands’ policies and practices, providing documents, answering
19 questions, and coordinating with other representatives. My attorneys were accessible and
20 responsive throughout the case.

21 10. I made myself available for mediation on May 20, 2025, before Judge Cole, which did
22 not result in settlement due to Artemis Headlands’ failure to provide accurate and current
23 sampling information. I again participated in mediation on August 14, 2025, with mediator Kelly
24 Knight, at which time the parties reached a settlement. I discussed the settlement terms with my
25 attorneys, understood my role in representing absent aggrieved employees, and sought the best
26 possible outcome for the class. I believe the settlement provides a fair and favorable resolution.
27 I reviewed and signed the long-form settlement agreement on December 8, 2025.

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1 11. I actively participated in this litigation by remaining in contact with my attorneys and
2 devoting substantial time to discovery and mediation efforts. Although I did not maintain a
3 precise record of my time, I estimate that I spent approximately ten (10) to twenty (20) hours
4 working on this case, and I understand additional time may be required. I believe I have fulfilled
5 my duties as a representative Plaintiff and will continue to act in the best interests of the class.

6 12. Considering the time and effort I devoted to this case, the risks associated with suing a
7 former employer, the potential impact on my future employment, the general release provided,
8 and the size of the settlement, I believe a representative service payment of five thousand dollars
9 (\$5,000.00) is fair and reasonable. I also believe that the individual twenty thousand dollar
10 (\$20,000.00) payment to Plaintiff Ruth Joy Segovia for her individual Retaliation claim is both
11 fair and reasonable.

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13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct. Executed on December Dec 30, 2025, 2025, at San Diego,
15 California.

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18 LISA FITZGIBBONS
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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 Treena Street, Suite 212, San Diego, California 92131. On Tuesday, December 30, 2025, I served a copy of the following documents:

- **NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **MEMORANDUM OF POINTS AND AUTHORITIES FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF BROOKE B. NEVELS IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF RUTH JOY SEGOVIA IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF RENE AMEL PERALTA IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF CYNTHIA GUERRERO IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF LISA FITZGIBBONS IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF FARANAK KIANFAR IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF DIEMVY PHAM IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF LISA MULLINS IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**

☒ **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.

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Attorneys for Defendants

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on Tuesday, December 30, 2025, at San Diego, California.



RAHA RAZAVI