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Attorneys for Plaintiff
CARLOS SANTOS GRANADOS

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

CARLOS SANTOS GRANADOS, individually,
and on behalf of all others similarly situated,

Plaintiff,

v.

SUNNY HILLS MANAGEMENT CO., INC., a
California corporation; and DOES 1 through 10,
inclusive,

Defendant.

Case No. 23STCV02109

CLASS ACTION

*Assigned For All Purposes to the Hon. Elaine
Lu, Department 9*

**PLAINTIFF CARLOS SANTOS
GRANADOS' DECLARATION IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

*[Filed with Notice of Motion and Motion,
Memorandum of Points and Authorities, the
Declaration of John G. Yslas, and Proposed
Order]*

PRELIMINARY APPROVAL HEARING

Date: March 11, 2025

Time: 10:00 a.m.

Place: Department 9

Complaint filed: September 30, 2022

Trial date: Not set

DECLARATION OF CARLOS SANTOS GRANADOS

I, Carlos Santos Granados, 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 proposed class representative in this action and submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class & Representative Action Settlement.

3. I am a former employee of defendant Sunny Hills Management Co., Inc. ("Defendant" or "Sunny Hills"). I worked for Defendant from approximately November 2020 to approximately October 2022 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to Defendant's patterns and practices that have been alleged as unlawful in the operative complaint and LWDA Notice sent to Defendant and the Labor & Workforce Development Agency.

4. I have pursued this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all my meal periods and rest breaks. While working for Defendant, my coworkers and I were asked to work long hours because of the amount of work, oftentimes without taking meal periods and/or rest breaks. My meal periods and rest breaks were often interrupted by supervisors asking me to perform work tasks or respond to emergency repair requests. I frequently performed work tasks while off-the-clock as I was placed on call and was required to respond to any "emergency" repair requests. I also observed my co-workers working long hours without taking breaks. I was not reimbursed for using my own personal cellphone when taking business related calls on behalf of Defendant.

5. By participating in this lawsuit as a proposed Class Representative, I hoped that I might be able to change Defendant's practices to better protect the working conditions of my co-workers. I also understood it was my duty as the Class Representative to represent the best interests of the class, know about the lawsuit, help my attorneys, and keep updated on the case.

6. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees at Sunny Hills.

7. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Sunny Hill's company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Sunny Hills.

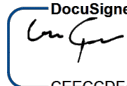
8. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and information to my attorneys, keeping in regular contact with my attorneys regarding the status of the case, and reviewing the settlement agreement to make sure it was fair.

9. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

10. I do not have any interest, financial or otherwise, in the proposed third-party administrator, Phoenix Settlement Administrators.

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

Executed on the 1/4/2025, at Los Angeles, California.

DocuSigned by:

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 CARLOS SANTOS GRANADOS