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14 Attorneys for Plaintiff MARQUITA N. WOOLDRIDGE,
15 on behalf of herself and current and former aggrieved employees

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

18 MARQUITA N. WOOLDRIDGE, on behalf of
19 herself and current and former aggrieved
20 employees

21 Plaintiff,

22 vs.

23 AGVA, LLC; and DOES 1 to 100, inclusive,

24 Defendants.

Case No.: 23STCV13199

Related Case No.: 23STCV07309

PAGA ACTION

*[Assigned for All Purposes to the Hon.
Theresa M. Traber; Dept. 1]*

**DECLARATION OF MARQUITA N.
WOOLDRIDGE IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF PRIVATE ATTORNEYS GENERAL
ACT SETTLEMENT**

*[Filed concurrently with the Notice of Motion
and Motion for Approval of Private Attorneys
General Act Settlement; [Proposed] Order]*

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**DECLARATION OF MARQUITA N. WOOLDRIDGE IN SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT**

DECLARATION OF MARQUITA N. WOOLDRIDGE

I, Marquita N. Wooldridge, declare:

1. I am over the age of 18 and am the named Plaintiff and PAGA representative in this matter. I have personal knowledge of the matters stated herein, and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. This declaration is submitted in support of approval of the Private Attorneys General Act settlement in this matter.

3. I worked for Defendant AGVA, LLC ("Defendant"), as an hourly non-exempt certified nurse assistant from approximately June 2021, until approximately April 2023.

4. From the time of the filing of the lawsuit, I have understood that this is a Private Attorneys General Act lawsuit where I represent the interests of the State of California, and all hourly, non-exempt employees who worked for Defendant in California during the PAGA Period.

5. I believe that while working for Defendant, I and all hourly, non-exempt employees of Defendant who worked for Defendant in California during the PAGA Period were subject to the same policies and procedures regarding payment of minimum and overtime wages, meal and rest periods, wage statements, and final payment of wages. I believe that the claims of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the PAGA Period are identical to mine because Defendant's policies and procedures applied to all of us.

6. I understand that I must continue to consider and protect the interests of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the PAGA Period. I have been protecting the rights of myself and all hourly, non-exempt employees of Defendant who worked for Defendant in California during the PAGA Period, since approximately September 2022, when I first started looking for an attorney before this lawsuit was filed. I have been and continue to place the interests of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the PAGA Period before my own. I do not have any interests that conflict with those of other Aggrieved Employees.

7. I provided information and made myself available to my attorneys since

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1 approximately September of 2022, when I first started searching for an attorney. I have helped and
2 been willing to support the lawsuit in any way I can for the last approximately 35 months, since
3 September of 2022, when I began searching for an attorney for the claims in this lawsuit. I have
4 searched for an attorney, met with my attorneys to see if they would represent me, met with my
5 attorneys to discuss the Defendant's policies, procedures, and practices for clocking in and out,
6 paying wages for the hours that we worked, meal and rest periods, wage statements, and final
7 payment of wages. I spent time searching for policies and procedures that were given to me during
8 my employment, any timecards I had, any pay stubs I had, handbooks, and other documents related
9 to my employment. I produced all the documents to my attorneys. I responded to almost all of my
10 attorneys' telephone calls and interviews, and I met with them in person and/or telephonically to
11 discuss any questions they had about my employment, Defendant's policies and procedures, and
12 Defendant's payment of wages, providing wage statements, termination of employees, or the
13 documents I had provided to them. I was available during the full-day mediation in this case. On
14 March 20, 2025, I was deposed, which required a significant amount of time and effort. Once the
15 settlement agreement was finalized, I conferred with my attorneys on multiple occasions to review
16 and discuss the settlement agreement before signing. I would estimate that I have spent between 50-
17 60 hours working on and being available for this case.

18 8. I understand that in the event this matter proceeds to trial, I must come to court to
19 participate in the trial. I will come to court if I am needed and have been ready to perform any
20 responsibility that is necessary for this lawsuit. I also understand that I have taken a risk by filing
21 this lawsuit because if I had lost, I would have to pay for all the costs incurred by the Defendant in
22 the lawsuit. I also have the risk of losing income for any time that I would have to spend fulfilling
23 my responsibilities, including having to attend the trial. I also believe that by filing this lawsuit,
24 future employers may learn of the lawsuit and view me negatively because I hired an attorney and
25 sued my employer when I thought my rights were violated, and I believe that this may affect future
26 job prospects. The other employees will be receiving money from this lawsuit, and they have not
27 had to file a lawsuit, look for an attorney, or take the risks that I have had to take.

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9. I understand that the settlement we have reached in this case must be approved by the Court, and I must protect the interests of all hourly, non-exempt aggrieved employees of Defendant who worked for Defendant in California during the PAGA Period.

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

Executed this 18th day of August 2025, in Gardena, California.

Myra Wells Mar 1900

Marquita N. Wooldridge