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12 Attorneys for Plaintiffs
13 REBECCA HANNETT, MITZI YALOA BURCIAGA, and the Proposed Class

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

16 REBECCA HANNETT, individually, and
17 on behalf of other members of the general
public similarly situated; MITZI YALOA
18 BURCIAGA, individually, and on behalf of
other members of the general public
19 similarly situated and on behalf of other
aggrieved employees pursuant to the
20 California Private Attorneys General Act;

21 Plaintiffs,

22 vs.

23 SERENDIPITY HEARING, INC., an
unknown business entity; SERENDIPITY
24 HEARING, INC., a California corporation;
WILLARD CLAYTON GILILLAND,
25 individually; SONUS HEARING CARE
PROFESSIONALS, an unknown business
26 entity; and DOES 1 through 100, inclusive,

27 Defendants.
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Case No.: 30-2021-01216930-CU-OE-CXC
(Related to Case No.: 30-2021-01229201 and
Consolidated for Pre-Trial Purposes Only)

**DECLARATION OF MITZI YALOA
BURCIAGA IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Hearing Information:

Date: March 27, 2025
Time: 2:00 PM
Dept.: CX104
Judge: Hon. Melissa McCormick

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1. I am over the age of 18 years old and a resident of the United States. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would do so competently. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

3. I was employed by Defendants as an hourly-paid Patient Care Coordinator from approximately March 2022 to approximately November 2022, in Los Angeles County, California.

5. I understand that as a Class Representative I have an important duty to look out for the best interests of the Class. I understood from the start of considering this case based on my discussions with my lawyers that I would have to take on significant responsibilities and burdens for the benefit of the Class, which could include having my deposition taken to give testimony under oath, that I could face the possibility of subpoenas being issued to former and current employers, and that I may testify in Court for the benefit of not only myself but the other members of the Class. I have had numerous conversations with my attorneys regarding this case in order to provide them with the information and documents that they needed to handle the matter. I answered numerous questions that my attorneys had about the case, reviewed the complaint when it was filed, participated in discussions about mediation and resolution of the matter, and reviewed the settlement agreement.

7. I know of no conflicts between my interests and goals and the interests and goals of

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anyone else in the Class.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on October 31, 2024, in Los Angeles, California.



MITZI YALOA BURCIAGA