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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

AMANDA SIRA, individually, and on behalf
of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

FOUNDATION PARTNERS GROUP, LLC,
a Delaware limited liability company;
MISSION MORTUARY, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 37-2023-00036172-CU-OE-CTL

Honorable James A. Mangione
Department C-75

CLASS ACTION

**DECLARATION OF AMANDA SIRA IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action and
PAGA Settlement; Declaration of Proposed
Class Counsel (Selena Matavosian); and
[Proposed] Order filed concurrently
herewith]

Date: September 20, 2024
Time: 9:00 a.m.
Department: C-75

Complaint Filed: August 21, 2023
FAC Filed: December 18, 2023
Trial Date: None Set

DECLARATION OF AMANDA SIRA

I, **Amanda Sira**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Foundation Partners Group, LLC (“Foundation Partners”) from approximately February 2021 to approximately September 2022 as a non-exempt employee. I decided to seek legal advice about my work experiences with Foundation Partners and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Foundation Partners was held accountable for not properly compensating their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 4 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative.

3. I have spent over 16 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Foundation Partners, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Foundation Partners. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout the case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many

documents as I could. I spent at least 18 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Foundation Partners.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 3 hours reviewing the settlement agreement and about 3 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me an enhancement award in the amount of \$7,500.00 for my active participation in this case and for my broader individual release and waiver of claims. Taking into consideration the significant time and effort that I have dedicated to this case and my broader individual release and waiver of claims, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and as an aggrieved employee.

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

Executed this ____ day of August 2024, at Tracy, California.

Electronically Signed 2024-08-27 00:02:21 UTC - 107.116.89.41

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Amanda Sira