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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

RICARDO F. FLORES, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

PASADENA HOSPITAL ASSOCIATION,
LTD., a California corporation; and DOES 1
through 10, inclusive,

Defendants

Flores Case No.: 23STCV27387
Lagunas Case No.: 23AHCV02007

**DECLARATION OF SANDRA YVETTE
LAGUNAS IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
ACTION AND PAGA SETTLEMENT**

Date: December 3, 2025
Time: 9:00 a.m.
Dept. 6

SANDRA YVETTE LAGUNAS, STEPHANIE
ESTELA CERTEZA, individually and on behalf
of all others similarly situated,

Plaintiff(s),

v.

PASADENA HOSPITAL ASSOCIATION,
LTD; a California nonprofit corporation and
DOES 1 through 100,

Defendants.

Flores Action filed: November 7, 2023
Lagunas Action filed: August 31, 2023

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Attorneys for Plaintiff Ricardo F. Flores

I, Sandra Yvette Lagunas, declare:

1. I am an individual currently residing in Los Angeles, California. I am over the age of 18, and the following is based upon my own personal knowledge. If called to testify, I could and would testify thereto.

2. I was employed by Pasadena Hospital Association, LTD (hereinafter referred to as “Defendant”) from September 16, 2021 through July 9, 2023 in admissions.

3. I initiated my first contact with Frontier Law Center prior to the complaint in this action being filed in August 2023. Thereafter, I jointly retained Frontier Law Center and Janelle Carney – Attorney at Law, APC to represent me in the Private Attorney General Act (“PAGA”) action in or about January 2024. I spoke to the lawyers at Frontier Law Center as well as Janelle Carney – Attorney at Law, APC, and their staff regularly through the past two (2) years since retaining them as Counsel.

4. I understand that the lawsuit alleges Defendant did not pay wages to hourly employees for all the time that they worked each day, improperly calculated the regular rate of pay, failed to provide proper meal and rest breaks, including requiring employees to take on-duty meal periods and failing to provide proper off-duty rest breaks off premises. I also understood that the lawsuit alleged that the paystubs provided by Defendant was not compliant with the labor code and that there were allegations that employees who either quit or were terminated from Defendant were not paid all their earnings due to the claims made in the lawsuit.

5. While I was employed by Defendant, I was not able to take legally compliant meal breaks due to Defendants’ policy requiring me and other hourly employees to stay on premises for a meal break. I had to be relieved in order to take a meal break and Defendant failed to provide sufficient coverage which would frequently require me to take late or interrupted meal breaks.

6. During my employment with Defendant, I was not authorized or permitted to take the two (2) duty-free off premises 10-minute rest periods on my 8-hour shifts. I was frequently called back from my rest breaks to respond to work requests. I was not allowed to leave the premises while on a rest break.

7. I had difficulty understanding the information that was provided to me on my pay stubs.

8. I believed that the policies of which I complained were the same for all Defendant's hourly employees. I was able to provide documents and to review documents that were produced in this action including paystubs some policy documents regarding the production bonuses. I believe that the documents that I provided to my counsel as well as documents produced by Defendant verify that Defendant was not properly paying me or other hourly employees. I assisted in all aspects of this litigation, helping to draft discovery which my attorneys sent on behalf of myself and the putative class members, and attending attorney meetings and multiple telephonic conferences in preparation for mediation. I did review documents provided to me by my attorneys and spent numerous hours in discussions about this matter with my attorneys at the Frontier Law Center as well as Janelle Carney – Attorney at Law, APC.

9. I sat for a full day deposition on April 24, 2024. I was discussing the upcoming trial of January 2026 with counsel and preparing for said individual trial.

10. Despite numerous family obligations and work matters, I have spent at least 40-50 hours on this case since my initial contact with the lawyers on this matter, nearly two (2) years ago and anticipate more time as the class settlement notice will be mailed shortly. I asked for and was provided all relevant documents and pleadings in this case including the defense position in preparation for mediation. I have reviewed the settlement papers and the payroll, time records, and policy documents that were produced in the litigation and for the mediation session. I was also involved in discussing evidence and the expert exposure provided in advance of mediation. I participated in all calls as requested by counsel.

11. I attended the Zoom call during the mediation on July 29, 2025 and was available to discuss the settlement with my counsel. I was involved in the settlement negotiations and discussions with Frontier Law Center and Janelle Carney – Attorney at Law, APC. I gave my authorization to negotiate, and the parties settled at mediation under the guidance of Tripper Ortman.

1 12. I am an adequate representative of the hourly employees. I also believe that I am
2 adequate to represent all class members in the claims that are being certified on a conditional
3 basis as a result of the settlement. My interests are the same as the other hourly employees, as
4 Defendant utilized one timekeeping system for all hourly employees and one common meal/rest
5 period policy and practice. I have no interests antagonistic to the class. I also believe my
6 attorneys, including co-counsel Janelle Carney – Attorney at Law, APC and Frontier Law
7 Center, are adequate to represent the class. I have always been prepared and willing to remain a
8 class representative through trial in this matter, if necessary.

9 13. Prior to agreeing to be a class representative, I was asked to be a Class
10 Representative in this action and I agreed. I was informed and gladly agreed to accept the
11 following in regard to my role as a class representative:

12 a. A class representative represents the interests of all members of the class
13 in the litigation to recover money damages or obtain injunctive relief for the class;

14 b. I would and did represent all persons who are similarly situated with
15 respect to a common course of conduct or practice. In other words, all those
16 persons who are affected by the challenged behavior;

17 c. A class representative has claims that are typical of those of the class, and
18 thus involve common issues of law or fact;

19 d. A class representative always considers the interests of the class just as he
20 would consider his own interests and must put the interests of the class before his
21 own interests. This means that I am a champion of the class or a fiduciary
22 litigant;

23 e. A class representative always actively participates in the lawsuit, as
24 necessary, by, among other things, answering interrogatories, producing
25 documents to the defendants and giving deposition and trial testimony if required.
26 I understood that I may be required to travel to give such testimony;

1 f. A class representative recognizes and accepts that any resolution of the
2 lawsuit, by dismissal or settlement, is subject to Court approval, and must be
3 designed in the best interest of the class as a whole;

4 g. A class representative is not required to be particularly sophisticated or
5 knowledgeable about the subject of the lawsuit. However, a class representative
6 should follow the progress of the lawsuit and should provide all relevant facts to
7 the lawyers for the class. I did follow the progress of the case from the day it was
8 filed until the present;

9 h. A class representative volunteers to represent or champion many other
10 people with similar claims and injuries because of the importance of the case and
11 that necessity that all class members benefit from the lawsuit equally; the savings
12 of time, money and effort should benefit all parties and the Court. Class actions
13 are an important tool to assure compliance with the law even where an individual's
14 losses may be relatively small.

15 14. I also understood that I was acting as a Private Attorney General on behalf of the
16 aggrieved employees and the State of California. I believe that the Class Action Settlement in the
17 gross amount of One Million Eight Hundred Seventy-Five Thousand Dollars and No Cents
18 (\$1,875,000.00) obtained on behalf of the class of approximately 5,737 class members is
19 excellent in view of the complex and varied issues involved with the case. I took into
20 consideration the strength and weakness of the various claims for all employees and along with
21 my attorneys agreed to the settlement. I was prepared to sit for trial, PAGA trial, and individual
22 trial if necessary and was preparing. I strongly support the settlement in this matter. When I was
23 contemplating settlement, I always kept the best interests of the class in mind over my own and I
24 was not willing to settle the matter until I felt it was in the best interest of all class members. As
25 set forth above, I have been involved with the pleadings, discovery, and the settlement
26 negotiations prior to, during, and after the mediation session. I understand many risk factors that
27 were considered and financial issues that were considered when agreeing to the settlement being
28 presented to the Court. I have every reason to believe that the class members will be excited

1 about the settlement amount and their respective settlement share. Despite the financial
2 hardship that it would have caused me, I was prepared to sit in trial for up to 2-4 weeks, if
3 necessary.

4 15. I have no claim that was antagonistic to the class. I accepted the potential risk of
5 being liable for the opposing parties' costs if we were unsuccessful in this lawsuit. I have
6 accepted the stigma of being a class representative in a class action labor dispute which has
7 affected my future employability with Defendant and in the same industry.

8 16. Furthermore, it is my opinion that my request for a class representative
9 enhancement in the amount of \$10,000.00 for myself and the other two class representative
10 Plaintiffs, Stephanie Estela Librado Certeza, and Ricardo Flores, is fair, reasonable and adequate.
11 I had legitimate fear that my participation as a lead Plaintiff in this class action and PAGA
12 representative action would result in future issues should I try to work in the same industry. I
13 accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful
14 in this lawsuit, I will provide the Court with another declaration at the time of Final Approval
15 justifying the request after the Notice period has expired. I do understand that the enhancement
16 amount is not guaranteed and that the requested amount is fair and reasonable in light of my
17 work experience and the fact that I did give up my rights to sue Defendant by signing a general
18 release.

19 16. As part of this class settlement and in exchange for the \$10,000.00 class
20 representative enhancement, I am signing a general release. I am aware that many of my former
21 co-workers were afraid to be added to the complaint for fear of retaliation and the inconvenience
22 of being a named plaintiff. Accordingly, I do believe that a \$10,000.00 enhancement is
23 reasonable and fair.

24 17. I support my attorneys' request for fees as I believe the fee request of 33.333% of
25 the gross settlement amount of \$1,875,000.00 or \$625,000.00. I understand and did provide my
26 written consent on or about August 7, 2025, to the attorney's fee split that provides that Janelle
27 Carney – Attorney at Law, APC and Frontier Law Center will each receive 25% and Moon Law
28 Group will receive 50% of any fee award as it relates to the class members/aggrieved employees

who worked as hourly employees for Defendants during the class periods. I specifically consent to the proposed fee split that would provide fees for each firm as follows:

Janelle Carney – Attorney at Law, APC:	\$166,666.66
Frontier Law Center:	\$156,250.00
Moon Law Group	\$156,250.00
Total Fee Request	\$625,000.00

18. I also believe that the attorneys' cost request of not to exceed \$40,000.00, exclusive of Settlement Administration Costs, is reasonable in light of the excellent work and favorable result my attorneys achieved for the members of the class. I believe that the attorneys' costs incurred to date from the lawyers retained to represent me and the class are reasonable and have been necessarily incurred and paid to prosecute this action and achieve this excellent result. I believe that my attorneys have worked hard and achieved an excellent result on behalf of the class.

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

Executed this 17 day of October, 2025, at Los Angeles, California.

DocuSigned by:

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 Sandra Yvette Lagunas