

David Mara, Esq. (230498)
Jill Vecchi, Esq. (299333)
MARA LAW FIRM, PC
2650 Camino Del Rio North, Suite 302
San Diego, California 92108
Telephone: (619) 234-2833
Facsimile: (619) 234-4048
Email: dmara@maralawfirm.com
jvecchi@maralawfirm.com

Peter Horton, Esq. (227678)
LAWYERS FOR EMPLOYEE AND CONSUMER RIGHTS
4100 West Alameda Avenue, Third Floor
Burbank, California 91505
Telephone: (323) 486-5101
Facsimile: (323) 306-5571
Email: phorton@lfecr.com

Attorneys for MARIA ISORDIA, on behalf of herself,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SONOMA

MARIA ISORDIA on behalf of herself,
all others similarly situated, and on
behalf of the general public,

Plaintiffs,

v.

TRESTLES HOLDINGS LLC DBA
HILLCREST POST ACUTE; and DOES
1-100,

Defendants.

Case No. SCV-273468
(Consolidated with Case No. 23CV01288)

*[Assigned for All Purposes to the
Hon. Christopher M. Honigsberg Dept. 18]*

**DECLARATION OF PETER J. HORTON,
ESQ., IN SUPPORT OF PLAINTIFF
MARIA ISORDIA'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION,
APPROVAL OF CLASS NOTICE,
SETTING OF FINAL APPROVAL
HEARING DATE**

Date: January 24, 2025
Time: 3:00 p.m.

Complaint Filed: June 9, 2023
Trial Date: None Set

1 I, PETER J. HORTON, declare as follows:

- 2 1. I am the managing litigation attorney at the law firm of Lawyers for Employee and
3 Consumer Rights and counsel of record for Plaintiff and the aggrieved employees in this
4 matter. I am duly admitted to practice before all the courts of the state of California. The
5 following facts are within my personal knowledge and, if called to testify, I could and
6 would competently testify thereto.
- 7 2. I graduated from California Western School of Law in 2002.
- 8 3. I was admitted to practice law in California in December 2003. I have practiced law in
9 State and Federal court since that time.
- 10 4. My firm and I handle employment cases which involve violations of the California Labor
11 Code and Industrial Welfare Commission Wage Orders, such as wage and hour class
12 actions and cases alleging violations of the Private Attorneys General Act of 2004
13 ("PAGA"). We are currently involved in litigation in over fifty (50) PAGA cases.
- 14 5. My firm has been granted class certification in both state and federal courts.

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

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18 Dated: December 20, 2024

**LAWYERS FOR EMPLOYEE AND CONSUMER
RIGHTS**

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Peter J. Horton, Esq.
Attorney for Maria Isordia, on behalf of himself,
all others similarly situated, and on behalf of the
general public.