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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. Honisberg, Dept. 18]*

**DECLARATION OF PLAINTIFF MARIA
ISORDIA IN SUPPORT OF
SETTLEMENT APPROVAL**

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

1 I, MARIA ISORDIA, hereby declare under penalty of perjury as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could
3 and would competently testify thereto, except as to those matters stated upon information
4 and belief, and as to those matters, I believe them to be true.
- 5 2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I
6 submit this declaration in support of settlement approval.
- 7 3. I worked for Trestles Holdings LLC dba Hillcrest Post Acute ("Trestles") as a non-
8 exempt, hourly employee during the Class Period.
- 9 4. Since becoming a class representative, I diligently worked on this case. I always answered
10 phone calls from my attorneys or called them back promptly when they called. I also
11 promptly responded to emails sent by my attorneys. On many occasions, I spoke with my
12 attorneys for case related purposes. At the beginning of the case, I searched for and
13 provided my attorneys with documents I received from Trestles, such as wage statements
14 I received during my employment. I assisted my attorneys in investigating the case. I
15 have worked diligently to help progress the case.
- 16 5. I was aware that, at some point in this case, I would have my deposition taken. I knew
17 that the deposition could take a full day and that I may have to meet with my attorneys
18 prior to my deposition. I was at all times ready and willing to sit for my deposition.
- 19 6. Although I did not attend the mediation in person, I was available on the phone for all the
20 negotiations, which I was kept apprised of and assisted in. I gave my consent to settle
21 with Trestles for the gross settlement amount of \$500,000. I completely and carefully
22 reviewed the Memorandum of Understanding ("MOU") and settlement agreement. I then
23 signed the MOU and settlement agreement.
- 24 7. In light of the work I performed in this case and the duties associated with being a class
25 representative in a case of this magnitude, I believe the \$5,000 class representative
26 enhancement payment is reasonable. I understand that this additional payment is not
27 guaranteed and is subject to Court approval.

1 8. I have and will continue to adequately represent all of the interests of the class. With my
2 status as class representative, I will treat the interests of the Class above my interests.

3 9. My claims are typical of the Class Members because I am similarly situated to all non-
4 exempt employees who work or have worked for Defendant anywhere in the State of
5 California from June 9, 2019, through September 9, 2024. Thus, my interests are the same
6 as all members of the proposed Class.

7 10. I recognize that any resolution of this matter must be approved by the Court in terms of
8 whether the settlement is fair and reasonable, and that I am obligated to protect the
9 interests of all of Class Members for the Class Period.

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

12 Dated: 12/16/2024

By:  MARIA ISORDIA
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