

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

Sabrina Sanders, Esq. (233833)
LAWYERS FOR EMPLOYEE AND CONSUMER RIGHTS
3500 West Olive Avenue, Third Floor
Burbank, California 91505
Telephone: (323) 486-5101
Facsimile: (323) 306-5571
Email: ssanders@lfecr.com

Attorneys for MARIA GOMEZ LEDESMA, 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 TULARE

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

Plaintiffs,

v.

PRO-YOUTH; and DOES 1-100,

Defendants.

Case No. VCU302539

*[Assigned for All Purposes to the
Honorable Bret Hillman; Dept. 2]*

**DECLARATION OF PLAINTIFF MARIA
GOMEZ LEDESMA IN SUPPORT OF
SETTLEMENT APPROVAL**

Complaint Filed: June 6, 2023

Trial Date: None Set

1 I, MARIA GOMEZ LEDESMA, 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 the named Plaintiff in the above-captioned lawsuit, and I submit this declaration in
6 support of settlement approval.
- 7 3. I worked for Pro-Youth as a non-exempt hourly employee in California. I started working
8 for Pro-Youth on or about January 28, 2019, and was employed by Pro-Youth until on or
9 about November 18, 2022.
- 10 4. I originally decided to contact an attorney because I felt that some of Pro-Youth's policies
11 and practices violated the law.
- 12 5. Since filing this case, I diligently worked on this case. I have been in regular contact with
13 my attorneys throughout the prosecution of this case and have been kept apprised of all
14 aspects of the case. Throughout the litigation, I have always been available to provide my
15 attorneys with helpful information for this lawsuit.
- 16 6. I always answered phone calls from my attorneys or called them back promptly when they
17 called. I also promptly responded to emails sent by my attorneys. On many occasions, I
18 spoke with my attorneys for case related purposes.
- 19 7. At the beginning of the case, I searched for and provided my attorneys with documents I
20 received from Pro-Youth, such as my paycheck stubs and emails sent to me by Pro-Youth.
- 21 8. Although I did not attend the mediation in person, I was available via phone. I was kept
22 apprised of the settlement negotiations at and after the mediation.
- 23 9. I gave my consent to settle with Pro-Youth for the gross settlement amount of \$350,000,
24 which I find to be fair and reasonable.
- 25 10. I completely and carefully reviewed the settlement agreement. I then signed the settlement
26 agreement.
- 27 11. I estimate that I spent approximately 40 hours in prosecuting this case.

12. I initiated this lawsuit on behalf of myself and the other aggrieved employees because I wanted to fix what I perceived as problems affecting all of us. From the very beginning, I understood that I was participating in this case, not only for my own benefit, but for the many past and present hourly, non-exempt employees.

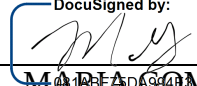
13. While I truly believe that I was doing the right thing in pursuing this case, I do believe that I have paid a price for the greater good of other employees, who will now obtain some relief through the terms of the proposed settlement.

14. In light of the work I performed in this case and the duties associated with being the named plaintiff in a case of this magnitude, I believe the \$10,000 PAGA representative payment request is reasonable. I understand that this additional award is not guaranteed and is subject to Court approval.

15. I have and will continue to adequately represent all of the interests of the Aggrieved Employees. I will treat the interests of the Aggrieved Employees above my own interests.

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

Dated: 7/1/2025

DocuSigned by:
By: 
MARIA GOMEZ LEDESMA