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Attorneys for Plaintiff
GILLIAN REY MORRIS, individually and on behalf of the putative class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

GILLIAN REY MORRIS, individually and on
behalf of the putative class,

Plaintiff,

vs.

COLLABERA, INC., a corporation;
COLLABERA LLC, a Limited Liability
Company; and DOES 1-50, Inclusive,

Defendants.

CASE NO.: 23STCV18770

CLASS AND PAGA ACTION

Assigned for All Purposes To:
Hon. David S. Cunningham III
Dept.: 11

DECLARATION OF GILLIAN REY MORRIS

*[Filed concurrently with Plaintiff's Unopposed
Motion for Final Approval of Class Action and
PAGA Settlement; Declaration of Danny Yadidsion;
Declaration of Nathalie Hernandez of ILYM Group,
Inc.; and [Proposed] Final Judgment]*

Date: March 24, 2026
Time: 10:00 a.m.
Dept: 11

DECLARATION OF GILLIAN REY MORRIS

I, Gillian Rey Morris, declare as follows:

1. I am over the age of eighteen and submit this declaration in support of Plaintiff's Motion for an Order of Final Judgment Approving the Class Action and PAGA Settlement.

2. All matters contained herein are within my personal knowledge and belief, and, if called and sworn, I can and will testify completely thereto. I was not promised any benefit nor induced to provide this Declaration in any way but am submitting it in support of Plaintiff's request that this Court grant final approval of the Parties' Joint Stipulation of Class Action and PAGA Settlement and Release, fully executed on December 3, 2024, as amended by the Supplemental Addendum to Joint Stipulation of Class Action and PAGA Settlement and Release ("Supplemental Addendum") fully executed on July 31, 2025 (collectively, the "Settlement Agreement"), filed concurrently herewith and attached as **Exhibit B** to the Declaration of Danny Yadidsion, filed concurrently herewith.

3. I was employed by Ascendion, Inc. (formerly known as Collabera, Inc.) and Collabera, LLC (collectively, "Defendants") from approximately August 23, 2021 through on or about August 12, 2022. While working for Defendants, I contend that I was misclassified as an exempt employee and I did not receive legal minimum wages for all hours I worked and did not receive overtime wages for all the overtime hours I worked. In addition, I did not receive legally compliant meal and rest periods while I worked for Defendants, nor did I receive meal or rest period premium wages for noncompliant meal and rest periods. Defendants also failed to provide me with accurate and legally compliant wage statements throughout my employment and failed to pay me all wages due to me at the time of my separation from Defendants' employment. After talking with my co-workers, I found out that my claims are typical of what happened to them.

4. I believe that I am an "aggrieved employee" within the meaning of the PAGA, and a proper representative to bring a civil action on behalf of other current and former employees of Defendants. I was employed by Defendants within a year prior to filing the complaint and have alleged uniform policies and practices that were committed against me and other coworkers.

5. I understand Defendants employed other employees in California. I brought this action on

1 behalf of myself and other Class Members and PAGA Group Members as defined in the Parties'
2 Settlement Agreement. I further understand that the claims in this action are based on Defendants' alleged
3 practices of: classifying employees as exempt while paying salaries below the minimum threshold
4 required for exempt status, the resulting failure to pay overtime and other wages owed, failure to provide
5 required meal periods; failure to provide required rest periods; failure to pay overtime wages; failure to
6 timely pay wages during employment; failure to pay all wages due to discharged and quitting employees;
7 failure to pay minimum wages; failure to maintain required records; failure to furnish accurate, itemized
8 wage statements; and engaging in unfair and unlawful business practices.

9 6. After consulting and meeting with my counsel regarding complaints I had against
10 Defendants for the above enumerated claims, I agreed to represent my fellow employees in bringing this
11 class action. I also understand that I am serving as the representative plaintiff on behalf of other similarly
12 situated aggrieved employees in California.

13 7. I understand that on July 31, 2023, my counsel provided written notice of these claims to
14 the California Labor and Workforce Development Agency, and that, on August 8, 2023, my counsel filed
15 a class action complaint in Los Angeles County Superior Court alleging that Defendants violated several
16 provisions of the California Labor Code, including failure to provide required meal and rest periods,
17 failure to pay minimum and overtime wages, failure to timely pay all wages during employment and at
18 separation, failure to maintain required records, failure to furnish accurate, itemized wage statements, and
19 unfair and unlawful business practices.

20 8. My counsel also filed a First Amended Class Action Complaint on December 1, 2023. The
21 First Amended Class Action Complaint added a representative claim under the PAGA seeking civil
22 penalties based on the Labor Code violations alleged in the Action.

23 9. As a former employee of Defendants, I believe that my claims are similar to those of the
24 other workers whom I seek to represent. I and the other employees who are part of the Class were subjected
25 to similar procedures, practices, and policies. I believe my claims are typical of the employees whom I
26 seek to represent, our interests are aligned, and I am adequate to represent them. Further, I understand
27 that, in representing the interests of the Class, I am assuming a fiduciary responsibility to all absent class
28 members.

1 10. To my knowledge, there are no conflicts that exist between my interest in this action and
2 the interest of the class members that would impair my ability to serve as a representative.

3 11. I have assisted, and will continue to assist, in the investigation, prosecution, and settlement
4 of this matter. I understand my duties and responsibilities to the class members and will carry out those
5 duties, as necessary. In that regard, I understand that courts may approve a payment to a class
6 representative in recognition of the work performed on behalf of the class, but that I am not entitled to
7 such a payment as a matter of right, and that I have not been promised or guaranteed any payment for
8 serving as the class representative. I understand we are filing the present Motion for Final Approval asking
9 the Court to approve a Class Representative Incentive (Enhancement) Award of up to \$10,000.00,
10 consistent with the Court's July 8, 2025 Order and the Supplemental Addendum, which would be paid
11 from the Gross Settlement Amount and would be in addition to my Individual Settlement Payment as a
12 Settlement Class Member under the Settlement Agreement. I further understand that if the Court awards
13 less than the requested amount, the difference will remain in the Net Settlement Amount for distribution
14 to Settlement Class Members.

15 12. Throughout the duration of this case, I actively participated in the prosecution of this action
16 and expended significant time and effort to support the litigation on behalf of the class. My involvement
17 included the following:

18 a) Initial Case Development (Approx. 5 hours): Participated in multiple intake and case
19 development interviews with Labor Law PC ("Class Counsel") regarding the factual background of the
20 case and my employment with Defendants.

21 b) Document Review and Production (Approx. 6 hours): Collected and reviewed relevant
22 documents, including paystubs, timesheets, and correspondence. Reviewed my personnel file and
23 verified documents produced by Defendants.

24 c) Case Strategy and Fact Investigation (Approx. 4 hours): Provided factual context and
25 helped identify potential witnesses and workplace practices relevant to overtime, break policies, and
26 wage statement claims.

27 d) Discovery Assistance (Approx. 3 hours): Responded to counsel inquiries related to written
28 discovery, including interrogatories and document requests served on Defendants.

1 e) Mediation Preparation and Debriefing (Approx. 2 hours): Met with counsel before and
2 after the mediation to discuss case strategy, evaluate offers, and provide input on settlement terms.

3 f) Ongoing Communications and Litigation Support (Approx. 15 hours): Maintained regular
4 contact with counsel throughout the case, including calls and emails for updates and case management.

5 In total, I spent approximately 35 hours supporting the prosecution of this case.

6 13. Before and after the Complaint initiating this action, I have had numerous conversations
7 and exchanged correspondence with the attorneys of Class Counsel. After speaking with Class Counsel, I
8 learned how a class action and representative action lawsuit could address the complaints I shared with
9 other similarly situated employees of Defendants. I was happy to be able to bring a lawsuit as a class
10 representative to try and obtain the unpaid wages and other compensation not only for myself, but also for
11 fellow employees like me, who had not been paid for all their hours worked, had not received all overtime
12 and minimum wages owed, and had not received all required breaks.

13 14. From the beginning of my involvement in this case, my attorney informed me about what
14 it meant to be a class representative. I understood that I was expected to represent and even champion the
15 other employees' interests, placing their interests ahead of my own and that my claims and damages had
16 to be similar to theirs. Thus, I understood it to be my duty to ensure that all similarly situated employees
17 receive the compensation that they are owed.

18 15. I agreed to proceed as a class representative because it was important to me that my fellow
19 employees get paid for all the hours they worked and were under Defendants' control, and not just myself.
20 My attorney explained to me in great detail the risks, responsibilities, and duties of being a class
21 representative. As a class representative, I understood it was my responsibility to actively participate in
22 the lawsuit to safeguard the interests of other similarly situated employees and to ensure that my interests
23 were not in conflict with those of the other employees. I did so to the best of my ability. I do not believe
24 that I have any interests that are adverse to those of the employees whom I seek to represent and have
25 placed and will continue to place the interests of the class above my own.

26 16. I was glad to serve as a named Plaintiff and a class representative of my fellow similarly
27 situated employees, but this case has required a major time commitment from me and has demanded my
28 attention and focus. I have spent a substantial amount of time and energy contributing to the investigation,

1 prosecution, and settlement of this case. I have spent several hours on the following tasks:

- 2 a. Talking to my attorney about getting involved in this case;
- 3 b. Being interviewed in detail by my counsel regarding the working conditions at Defendants'
- 4 places of business, and particularly the nature and extent of my experiences and the policies
- 5 and practices that applied to my employment and the employment of the other similarly
- 6 situated employees;
- 7 c. Searching for and gathering all relevant documents in my possession and providing them
- 8 to my attorneys;
- 9 d. Speaking with my attorney about potential witnesses and Class Members;
- 10 e. Regularly receiving and responding to correspondence and phone calls from my attorney,
- 11 including during mediation sessions, regarding the claims and Defendants' arguments;
- 12 f. Participating in preparation for a mediation session and remaining available to answer
- 13 questions and provide necessary approval; and
- 14 g. Conducting numerous conferences with my attorneys regarding the Stipulation and
- 15 finalizing the Stipulation, and regarding the settlement administration proceedings and
- 16 preliminary and final approval processes.

17 17. Throughout this case, I have frequently spoken with my attorney and stayed in even closer
18 contact when dealing with specific issues. My attorney often had questions for me about Defendants and
19 my work experience there during his investigation of the case. My attorney also asked me to review
20 documents related to the case, including the Settlement Agreement and many of the pleadings we filed,
21 and I made sure to promptly respond and comply with his requests.

22 18. I have chosen to represent those who may be afraid to speak up because of fear of being
23 fired or retaliated against. I have remained in contact with my attorney regarding the litigation and
24 anticipate that I will continue to be contacted by class members regarding the status of the settlement,
25 including fielding questions regarding the issuance of settlement payments.

26 19. One of my fears is potential retaliation against me for filing this lawsuit. I expect that
27 wherever I work in the future, it is possible that my employer and immediate supervisors may have heard
28 of my involvement with this case. Any prospective employer doing a simple internet search on me will

1 learn of my role as a named Plaintiff and Class Representative in this lawsuit. Although they are not
2 supposed to retaliate against me, I think the reality is that I may experience a certain stigma for years to
3 come, and I fear retaliation or other adverse consequences will arise in my future employment due to my
4 decision to serve as a named Plaintiff and Class Representative in a class action against my employer.
5 Serving as the class representative required me to assume these risks in order to pursue relief for the
6 Settlement Class and aggrieved employees.

7 20. I reviewed the Settlement Agreement with Class Counsel to understand the benefits and
8 risks and ultimately determined it was fair and reasonable. Therefore, I followed Class Counsel's
9 recommendation to settle the claims. I took a huge risk by coming forward to help with this class action.
10 If the case had not resolved, I understood there was a risk of recovering nothing and that continued
11 litigation could impose significant financial burdens and other consequences on me.

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

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15 Executed on 02 / 18 / 2026 at Ellensburg, Washington.

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