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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF FRESNO**

DOMINIQUE CHAPARRO, individually, and
on behalf of all others similarly situated,

Plaintiff,

v.

CADENCE SL WINDHAM FRESNO, LLC, a
Delaware limited liability company; and DOES 1
through 10, inclusive,

Defendants.

Case No.: 23CECG03064

*Assigned for all purposes to:
Hon. Jon M. Skiles
Dept. 503*

**DECLARATION OF DOMINIQUE
CHAPARRO IN SUPPORT OF
AMENDED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: September 30, 2025
Time: 3:30 p.m.
Dept.: 503

I, Dominique Chaparro, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Defendant Cadence SL Windham Fresno, LLC (“Defendant”) as an hourly-paid, non-exempt Caregiver from around September 2022 to May 2023.

3. Based on my experience and knowledge of Defendant’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of Defendant.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of Defendant. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees of Defendant.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Defendant’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Defendant.

7. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid, non-exempt employees by initiating this lawsuit, providing information to my attorneys, keeping in regular contact with my attorneys regarding the status of the case, making

1 myself available during mediation, and reviewing the settlement agreement to make sure it was
2 fair.

3 8. I will continue to actively participate in this lawsuit as necessary and will continue to
4 make myself available to assist in this case moving forward as needed.

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

8 Executed on 6/6/2025, 2025, at Fresno, California.

9 Signed by:
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Dominique Chaparro