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

SILVIA PARRA DE LA CRUZ, individually,
and on behalf of all others similarly situated,

Plaintiff,

v.

CITRUS VALLEY MANAGEMENT
SERVICES, INC., a California corporation; and
DOES 1 through 10, inclusive,

Defendants.

Case No.: CVRI2301768

CLASS ACTION

[Hon. Harold W. Hopp, Dept. 1]

**PLAINTIFF SILVIA PARRA DE LA
CRUZ'S DECLARATION IN SUPPORT
OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF SILVIA PARRA DE LA CRUZ

I, SILVIA PARRA DE LA CRUZ, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am the proposed class representative in this action and submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class & Representative Action Settlement. I believe I have provided invaluable assistance during the course of this case, and I respectfully hope the Court will approve my request of a \$10,000 service payment for my role as the Class Representative.

3. I am a former employee of Defendant Citrus Valley Management Services, Inc. I worked for Defendant from approximately March 17, 2022 to approximately January 26, 2023 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to Defendant's patterns and practices that have been alleged as unlawful in the Class Action Complaint and Private Attorneys General Action Notice sent to Defendant and the Labor & Workforce Development Agency.

4. I have pursued this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all my meal and rest breaks. While working for Defendant, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks. My meal and rest breaks were often interrupted by supervisors and co-workers asking me to perform work tasks. I frequently performed work tasks while off-the-clock before the start of my shift and after the end of my shift. Additionally, after learning more about my rights, I learned that I was not being paid at the correct overtime rate for certain shifts. I also did not receive breaks during my employment and further observed my co-workers working long hours without taking breaks as well. I was also not reimbursed for necessary business-related expenses, including reimbursement for my mandatory work uniform, among other things.

5. By participating in this lawsuit as a proposed Class Representative, I hoped that I might be able to change Defendant's practices to better protect the working conditions of my co-

1 workers. I also understood it was my duty as the Class Representative to represent the best interests
2 of the class, know about the lawsuit, help my attorneys, and keep updated on the case.

3 6. Prior to commencing this case, I provided Wilshire Law Firm with a detailed account
4 of the facts related to my employment with Defendant. Based on our conversations, my attorneys
5 and I were able to identify instances when I was not paid correctly or instances in which I was not
6 provided with compliant meal or rest breaks.

7 7. I have invested a lot of personal time and energy while this lawsuit has been pending.
8 I made it a priority to be actively involved because I wanted to do everything I could to help my
9 attorneys in prosecuting this case. I regularly communicated with my attorneys to discuss updates on
10 the case and to provide information. I communicated with my attorneys via phone calls. Some of
11 these phone calls lasted up to an hour.

12 8. I made myself available during the full-day mediation for this case, and I kept in
13 regular contact with my attorneys before and after the mediation to ensure that any questions the
14 attorneys had could be answered.

15 9. I also reviewed pleadings filed in this case, my own time records and pay records, my
16 personnel file, as well as the settlement-related documents. While the documents were lengthy, I
17 spoke with my attorneys for further explanation.

18 10. I believe the settlement is a good settlement, and I would recommend that the Court
19 approve it, because I believe it is fair, adequate, and reasonable. I am glad that I have had the
20 opportunity to represent the Class in this lawsuit, and that I was able to recover money through a
21 settlement for the Class. I have also observed my attorneys' work throughout this case, and I believe
22 they have been thorough, diligent, prompt, courteous, and professional.

23 11. Standing up for myself and the rights of others was not an easy decision, and I am
24 relieved that this is coming to an end. I estimate that I spent at least 49 hours on this case between
25 my initial consultation, gathering of necessary documents, review of records and further
26 consultations on potential and actual violations, execution of agreements, calls both prior to and after
27 mediation, attendance at mediation, and further review of documents which my attorneys will file in
28 connection with the settlement.

13. I respectfully ask that the Court award me a \$10,000 service payment. I am receiving no additional compensation other than the compensation provided for in the settlement and have been informed by my attorneys that despite the settlement, I nor other Class Members will still have to likely wait months before the settlement is approved, if at all. Based on my involvement in this case and the benefits provided to my former co-workers, I can say I helped stand up for the other workers who may have been too afraid to say anything to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk, because I strongly care about helping my current and former co-workers. I also continue to fear that any employer may find out that I participated in this lawsuit and hold it against me. In a competitive job market, this factor may weigh heavily against me. Nevertheless, I felt that important rights were at stake that hurt myself and other employees.

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

Executed on the 7 day of June 2024, at Corona, California.

DocuSigned by:

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SILVIA PARRA DE LA CRUZ