

John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
Samantha A. Smith (SBN 233331)
samantha.smith@wilshirelawfirm.com
Diego Aviles (SBN 315533)
daviles@wilshirelawfirm.com
Harry Erganyan (SBN 333091)
herganyan@wilshirelawfirm.com
Mariam M. Nazaretyan (SBN 334154)
mnazaretyan@wilshirelawfirm.com
WILSHIRE LAW FIRM
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff Silvia Parra De La Cruz

**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

*Assigned for all purposes to:
Hon. Harold W. Hopp
Dept. 1*

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: April 22, 2025
Time: 8:30 a.m.
Dept.: 1

1 I, John G. Yslas, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all of the courts of the State of
3 California. I am a senior partner at Wilshire Law Firm, PLC (“WLF”), counsel for Plaintiff Silvia
4 Parra De La Cruz (“Plaintiff”) in this matter. I am thoroughly familiar with and have personal
5 knowledge of all of the facts set forth herein.

6 2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of Class
7 Action and PAGA Settlement.

8 3. Plaintiff is represented by WLF. The attorneys at WLF performed significant work
9 and expended litigation costs in prosecuting this matter with no guarantee of payment.

10 4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the
11 nation’s Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600
12 employees. WLF is actively and continuously practicing in employment litigation, representing
13 employees in both individual and class actions in both state and federal courts throughout
14 California.

15 5. WLF is qualified to handle this Litigation because its attorneys are experienced in
16 litigating Labor Code violations in individual, class action, and representative action cases. WLF
17 has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as
18 class actions involving consumer rights and data privacy litigation.

19 6. I graduated from the University of California, Santa Barbara with High Honors in
20 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law
21 School in 1996.

22 7. Upon graduating from law school in 1996, I worked for a boutique law firm
23 practicing general litigation which included employment law matters. Since 2000 (that is, the last
24 23 years) my practice has been exclusively focused on labor and employment matters including
25 handling wage and hour class, collective and representative actions (including the California
26 Private Attorneys General Act, or “PAGA”), including in the international law firms of Morgan,
27 Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP (where I was a
28 partner and a national Vice Chair of the Labor and Employment Group), Norton Rose Fulbright

1 LLP (where I was a partner) and Seyfarth Shaw (where I was a partner and member of the Wage
2 and Hour Practice Group). During my time at these law firms, I was the primary attorney or took
3 a major leading role in defending employers on numerous wage and hour class, collective and
4 representative actions.

5 8. In late June 2022 I left Seyfarth Shaw and joined my current firm, The Wilshire
6 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
7 hour class and representative actions litigating such matters on behalf of plaintiff employees in
8 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
9 defendants, I have successfully mediated the resolution of many wage and hour class, collective,
10 and representative actions. Just since starting to settle cases in late April 2023 I have already
11 successfully mediated matters in which I have been counsel or co-counsel resulting in **over \$100**
12 **million** in settlements which are in the process of being finalized, and with numerous upcoming
13 mediations scheduled. In those and numerous other matters, I have managed and assisted with the
14 litigation and settlement of many wage and hour PAGA and class actions. In those actions, I
15 performed similar tasks as those performed in the course of prosecuting this action.

16 9. I have received numerous awards for my legal work. For example, from 2015 to
17 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson Reuters).
18 have also served on numerous prominent boards and in other leadership positions, including
19 currently serving as Southern California Regional President for the Hispanic National Bar
20 Association and on the board of directors of the Mexican American Bar Foundation. I also
21 previously served on the 5-member Los Angeles Civil Service Commission, which generally
22 oversees the personnel decisions for the City of Angeles.

23 10. I have also published numerous blogs on labor and employment issues including on
24 wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-Impact on
25 Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You Really
26 Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a partner with
27 Seyfarth Shaw LLP). I have also been a presenter at numerous conferences, including being a
28 presenter involving the “Employment Law Update” at a National Employment Law Council

conference. I currently bill at an hourly rate of \$1,500.00.

11. Samantha A. Smith is a Senior Attorney at WLF where her practice is focused on managing wage and hour class action and PAGA settlements. Ms. Smith was admitted to the California Bar in December of 2004, and received a J.D. from University of California, Hastings College of the Law and a B.A. from University of California, Davis. Ms. Smith has dedicated her 20-year career to plaintiffs'-side class action litigation. Her wealth of experience includes successful work on all stages of class action litigation, including class action appeals, class certification motions, and class settlements. See, e.g., *Blue Diamond Growers Product Labeling Cases*, JCCP No. 4822 (Los Angeles County Superior Court) (false advertising of Blue Diamond food products); *Adam vs. eHealth, Inc.*, Case No. 17CV309050 (Santa Clara Superior Court) (employee data breach); *Overton v. Armour-Eckrich Meats, LLC*, Case No. CIVDS1501325 (San Bernardino County Superior Court) (unpaid wages, meal period and rest break claims, and PAGA violations for nonexempt employees); *DeLeon et al. v. Westlake Services, LLC*, Case No. BC 526750 (Los Angeles County Superior Court) (unpaid overtime, meal period and rest break claims for call center employees); *Sawyer v. Retail Data, LLC*, Case No. 30-2014-00753767-CU-OE-CXC (Orange County Superior Court) (unpaid wage and rest break claims for piece rate workers); *Nguyen v. Pharmerica Corporation et al.*, Case No. 30-2014-00716072-CU-OE-CXC (Orange County Superior Court) (unpaid wages and unreimbursed expenses for pharmacists); *Laumea v. Performance Food Group, Inc.*, Case No. CIVDS1407509 (San Bernardino Superior Court) (unpaid wages, meal and rest break claims for non-exempt employees); *Durroh v. East West Bank*, Case No. BC528860 (Los Angeles Superior Court) (overtime claims for failure to include bonuses in regular rate of pay for bank workers); *Gonzalez et al. v. SFFI Company, Inc. et al.*, Case No. CIVDS1504287 (San Bernardino Superior Court) (unpaid wages, meal period and rest break claims for non-exempt employees). Ms. Smith currently bills at an hourly rate of \$1,000.00.

12. Diego Aviles is a seventh-year Senior Attorney at Wilshire Law Firm. He graduated from the University of California, Irvine with a Bachelor of Arts in Political Science as well as a Bachelor of Arts in Criminology, Law, and Society, and received his Juris Doctor from the Santa Clara University School of Law in 2015. During law school, he was President for the Santa Clara

1 Employment Law Society, Board Member of the Honors Moot Court, and President of the Santa
2 Clara University La Raza Chapter. He clerked for the Equal Employment Opportunity Commission
3 in San Francisco, California, and also worked with the Workers Rights Clinic in San Jose,
4 California, among other employment law firms. He was admitted to practice law in the State of
5 California in 2017. Since graduating from law school, he has focused his legal work exclusively
6 on employment matters, including wage-and-hour class action and PAGA representative action
7 litigation, and he has helped obtain dozens of settlements on behalf California workers. He has
8 previously been appointed Class Counsel numerous times in California and most recently achieved
9 a published California Appellate opinion in the matter of Alberto v. Cambrian Homecare, et al., 91
10 Cal.App.5th 482 regarding employment arbitration agreements. He has also been a member of the
11 California Employment Lawyers Association (CELA) since at least 2019. Mr. Aviles currently
12 bills at an hourly rate of \$750.00.

13 13. Harry Erganyan is a fourth-year Associate Attorney at Wilshire Law Firm, PLC. He
14 was admitted to practice law in the State of California in 2021. Harry graduated from Loyola
15 Marymount University, with a Bachelor of Arts in Political Science. He received his Juris Doctor
16 from Southwestern Law School. During law school, he externed for the Los Angeles City Attorney.
17 Since January 2021, his practice has mainly been focused on wage and hour class action litigation.
18 Mr. Erganyan currently bills at an hourly rate of \$600.00.

19 14. Mariam Nazaretyan is a fourth-year Associate Attorney at Wilshire Law firm, PLC.
20 She was admitted to practice law in the State of California in 2021. Mariam graduated from Loyola
21 Marymount University with a Bachelor of Arts in Political Science. She received her Juris Doctor
22 from Southwestern Law School. During law school, she was a student editor for the Journal of
23 International Media and Entertainment Law and secretary of the Student Bar Association. Since
24 graduating, her practice has been focused on international humanitarian law and employment law.
25 Ms. Nazaretyan currently bills at an hourly rate of \$500.00.

26 15. WLF's fees have been approved by other courts in California. *See, e.g., Matthew*
27 *Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No. 22STCV37384, *Ismael*
28 *Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County Superior Court Case No.

CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*, Ventura County Superior Court, Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin Superior Court, Case No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch, LLC et al*, Los Angeles Superior Court, Case No. 23STCV04299; *Wing v. Road Machinery, LLC et al*, Kern County Superior Court, Case No. BCV-22-102896; *Hernandez v. SGPS Showrig Los Angeles, Inc.*, Los Angeles Superior Court, Case No. 22STCV28155; *Azevedo v. Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case No. VCU293325; *Haser v. Universal Chain of California, Inc.*, Sacramento Superior Court, No. 34-2022-00332268; *Caldera v. Performance Online, Inc. et al*, Riverside Superior Court, No. CVRI2306013; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San Joaquin Superior Court, No. STK-CV-UOE-2022-11056. The total hours expended on this action are reasonable and in line with comparable cases.

16. WLF has performed significant work and incurred litigation costs in prosecuting this matter with no guarantee of any payment. The efforts expended by Plaintiff's counsel to achieve this result include, but are not limited to, the following:

- a. the investigation of the matter, including meeting with Plaintiff, reviewing Defendants' policies, and requesting and reviewing Plaintiff's time and pay records, personnel files, and exploring the corporate structure of Defendant;
- b. filing the Action;
- c. attending status conferences and meeting and conferring with Defendants regarding the case;
- d. meeting and conferring with Defendants regarding mediation, exchange of informal discovery beforehand, and negotiating with opposing counsel regarding the parameters thereof;
- e. selecting a mediator and mediation date;
- f. working with opposing counsel and expert consultants for the receipt of a representative sampling and analyzing the same with the aid of expert consultants and Plaintiff to perform analyses of liability and exposure prior to attendance of the mediation in this matter;
- g. reviewing policy documents from Defendants and researching applicable defenses;
- h. preparation of a mediation brief and damages model for use at mediation;

- i. attendance at mediation by all Parties and Counsel;
- j. communicating with Plaintiff who requested updates or other information regarding this matter;
- k. negotiating, finalizing and fully executing the initial settlement agreement;
- l. preparing and filing the Motion for Preliminary Approval and supporting documents;
- m. negotiating, finalizing and fully executing the amendments to the initial settlement agreement pursuant to the Court's request, which are ultimately encompassed within the Settlement Agreement;
- n. preparing the supplemental memorandum in support of the Motion for Preliminary Approval and supporting documents;
- o. attending the hearings on Motion for Preliminary Approval;
- p. communicating with class members who sought additional information regarding the settlement, including answering questions regarding the settlement and obtaining updated addresses from class members for purposes of receiving the class notices and administering the settlement checks; and
- q. preparing the instant Motion for Final Approval and supporting documents.

17. WLF's current lodestar reflects 322.3 hours of work resulting in \$301,250.00 in fees. The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
John G. Yslas	88.6	\$1,500.00	\$132,900.00
Samantha A. Smith	35	\$1,000.00	\$35,000.00
Diego Aviles	110	\$750.00	\$82,500.00
Harry Erganyan	55	\$600.00	\$33,000.00
Mariam M. Nazaretyan	33.7	\$500.00	\$16,850.00
TOTAL	322.3		\$301,250.00

1 This amount surpasses the requested fee award of \$283,333.33, resulting in a negative multiplier.
2 This amount also does not include the time Class Counsel will spend at the final approval hearing
3 and assisting the Settlement Administrator following final approval. This time could have been
4 spent on other potentially lucrative cases. WLF dedicated significant resources to this case by
5 dividing the tasks required according to skill level, and the hours spent by each attorney are
6 reasonable and not duplicative. WLF's lodestar reflects the efficiencies achieved by attorneys
7 experienced in this field.

8 18. In litigation costs, WLF has spent \$21,687.24 on items such as filing fees, service
9 fees, mediation fees, and expert fees. Since Class Counsel's cost did not reach the maximum of
10 \$25,000.00 the remaining \$3,312.76 will revert to and increase the Net Settlement Amount. True
11 and correct copies of WLF's cost reports in this matter are attached hereto as **Exhibit 1**. All of the
12 costs incurred were reasonable and necessary for the prosecution of this case.

13 19. Class Counsel has negotiated a settlement here that they believe is fair, reasonable,
14 and adequate based on their prior experience litigating these types of cases.

15 20. On March 25, 2025, a copy of the Second Amended Class Action and PAGA
16 Settlement Agreement was submitted to the LWDA. Attached hereto as **Exhibit 2** is a copy of the
17 Confirmation from the LWDA regarding receipt of the Second Amended Class Action and PAGA
18 Settlement Agreement.

19 21. To date, the LWDA has not responded to or objected to the Settlement in this matter.

20 22. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiff Silvia Parra De
21 La Cruz's Declaration in Support of Plaintiff's Motion for Preliminary Approval of Class Action
22 Settlement submitted on June 27, 2024.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct. Executed on March 28, 2025 at Los Angeles, California.

25
26
27
28

John G. Yslas

EXHIBIT 1

Wilshire Law Firm, PLC
Client Costs Detailed Report

03/24/25

Accrual Basis

All Transactions

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 · COS							
501500 · Court Filing Fees							
Credit ...	04/10/2023		CitrusValleyMgmt(Parra).W&H	One Legal LLC	20166989-SUM&COM-Atty Svc for Court Filing-239848 Silvia ...	1,510.02	1,510.02
Credit ...	06/06/2023		CitrusValleyMgmt(Parra).W&H	One Legal LLC	20547416-CMS,Notice-Atty Svc for Court Filing-239848 Citrus...	175.79	1,685.81
Credit ...	06/07/2023		CitrusValleyMgmt(Parra).W&H	One Legal LLC	20547417-CMS,Notice-Atty Svc for Court Filing-239848 Citrus...	43.24	1,729.05
Credit ...	05/11/2023		CitrusValleyMgmt(Parra).W&H	Riverside Superior Court	(239848) CitrusValley.WageHour	15.00	1,744.05
Credit ...	05/10/2023		CitrusValleyMgmt(Parra).W&H	Orange County Superior Court	PR-UIXIE3XXFAR9JR9UD (239848) CitrusValley.WageHour.	15.00	1,759.05
Credit ...	06/20/2023		CitrusValleyMgmt(Parra).W&H	Riverside Superior Court	(239848) CitrusValleyMgmt(Parra).W&H	1.00	1,760.05
Credit ...	06/21/2023		CitrusValleyMgmt(Parra).W&H	Riverside Superior Court	PR-EKTN2VYNQ54LMRSVL (239848) CitrusValleyMgmt(Parr...	1.00	1,761.05
Credit ...	06/25/2024		CitrusValleyMgmt(Parra).W&H	Riverside Superior Court	PR-BBP2W9Q78GVMRKPU (239848) CitrusValleyMgmt(Pa...	1.00	1,762.05
Credit ...	09/26/2024		CitrusValleyMgmt(Parra).W&H	Riverside Superior Court	RM PR-Q2AMMT3N7LGL9ODF4 (239848) CitrusValleyMgm...	2.00	1,764.05
Credit ...	10/15/2024		CitrusValleyMgmt(Parra).W&H	Riverside Superior Court	RM PR-CQNFW2Q9PPXR3BTBB (239848) CitrusValleyMgm...	5.00	1,769.05
Credit ...	12/06/2024		CitrusValleyMgmt(Parra).W&H	Riverside Superior Court	RM PR-SSHD2QABFNMYGSUEA (239848) CitrusValleyMgm...	2.00	1,771.05
Credit ...	12/09/2024		CitrusValleyMgmt(Parra).W&H	Riverside Superior Court	RM PR-W6ZJO2AECUHSU37Q9 (239848) CitrusValleyMgmt...	15.50	1,786.55
Bill	05/18/2023	59537	CitrusValleyMgmt(Parra).W&H	Valpro Attorney Services, LLC	59537 CitrusValleyMgmt(Parra).W&H File POS	45.00	1,831.55
Bill	12/06/2023	68452	CitrusValleyMgmt(Parra).W&H	Valpro Attorney Services, LLC	68452 CitrusValleyMgmt(Parra).W&H- File POS	45.00	1,876.55
Credit ...	10/02/2023	21327857	CitrusValleyMgmt(Parra).W&H	One Legal LLC	21327857-92881-PARRA DE LA CRUZ vs CITRUS VALLEY ...	24.45	1,901.00
Credit ...	10/03/2023	21327858	CitrusValleyMgmt(Parra).W&H	One Legal LLC	21327858-92881-PARRA DE LA CRUZ vs CITRUS VALLEY ...	51.48	1,952.48
Credit ...	11/22/2023	21684518	CitrusValleyMgmt(Parra).W&H	One Legal LLC	21684518-CCCS.Comp.Cert-Atty Svc for Court Filing-239848 ...	1,510.02	3,462.50
Credit ...	12/12/2023	21810330	CitrusValleyMgmt(Parra).W&H	One Legal LLC	21810330-Notice-Atty Svc for Court Filing-239848 De La Cruz...	17.24	3,479.74
Credit ...	01/12/2024	22005156	CitrusValleyMgmt(Parra).W&H	One Legal LLC	22005156-CMS-Atty Svc for Court Filing-239848 De La Cruz v...	21.36	3,501.10
Credit ...	06/06/2024	23058823	CitrusValleyMgmt(Parra).W&H	One Legal LLC	23058823-239848-Atty Svc for Court Filing-Stip & Order-Citru...	17.45	3,518.55
Credit ...	06/14/2024	23100142	CitrusValleyMgmt(Parra).W&H	One Legal LLC	23100142-239848-Atty Svc for Court Filing-Amended Complai...	21.36	3,539.91
Credit ...	10/10/2024	23886935	CitrusValleyMgmt(Parra).W&H	One Legal LLC	23886935-239848-Atty Svc for Court Filing-Stip & Ord-CitrusV...	18.53	3,558.44
Credit ...	10/10/2024	23906805	CitrusValleyMgmt(Parra).W&H	One Legal LLC	23906805-239848-Atty Svc for Court Filing-Stip & Ord,POS-Ci...	42.64	3,601.08
Credit ...	10/21/2024	23913291	CitrusValleyMgmt(Parra).W&H	One Legal LLC	23913291-239848-Atty Svc for Court Filing-POS-CitrusValley...	20.96	3,622.04
Total 501500 · Court Filing Fees						3,622.04	3,622.04
502500 · Legal Expenses							
Credit ...	09/01/2023		CitrusValleyMgmt(Parra).W&H	Department of Industrial Rela...	ORD-000247024 (239848) CitrusValleyMgmt(Parra).W&H	75.00	75.00
Bill	10/13/2023	610485	CitrusValleyMgmt(Parra).W&H	Judicate West	610485-CitrusValleyMgmt(Parra).W&H-50% Mediation Fee sk...	8,375.00	8,450.00
Bill	03/06/2023	847939906	CitrusValleyMgmt(Parra).W&H	Thomson Reuters-West Publ...	Legal Research-CitrusValleyMgmt(Parra).W&H	49.99	8,499.99
Bill	03/08/2024	849827195	CitrusValleyMgmt(Parra).W&H	Thomson Reuters-West Publ...	Legal Research-CitrusValleyMgmt(Parra).W&H	282.37	8,782.36
Bill	09/03/2024	850711723	CitrusValleyMgmt(Parra).W&H	Thomson Reuters-West Publ...	Legal Research-CitrusValleyMgmt(Parra).W&H	576.65	9,359.01
Total 502500 · Legal Expenses						9,359.01	9,359.01
503200 · Process Service Fees							
Bill	05/18/2023	59460	CitrusValleyMgmt(Parra).W&H	Valpro Attorney Services, LLC	59460 CitrusValleyMgmt(Parra).W&H Serree: Citrus Valley M...	157.00	157.00
Bill	12/06/2023	68358	CitrusValleyMgmt(Parra).W&H	Valpro Attorney Services, LLC	68358 CitrusValleyMgmt(Parra).W&H- Serree: Citrus Valley ...	146.80	303.80
Total 503200 · Process Service Fees						303.80	303.80
503300 · Professional Fees							
Bill	02/15/2024	10567	CitrusValleyMgmt(Parra).W&H	Berger Consulting Group, LLC	10567-CitrusValleyMgmt(Parra).W&H-18.4 hrs of work	7,360.00	7,360.00
Total 503300 · Professional Fees						7,360.00	7,360.00
Total 500000 · COS							
						20,644.85	20,644.85
TOTAL						20,644.85	20,644.85

Wilshire Law Firm, PLC
Client Costs Detailed Report

03/24/25

Accrual Basis

All Transactions

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 · COS							
501500 · Court Filing Fees							
Credit ...	11/27/2024		CitrusValleyMngmtSvc	Riverside Superior Court	RM PR-C5VV7SLQKYKD8DGY (248880) CitrusValleyMngm...	2.00	2.00
Credit ...	01/16/2024	22005188	CitrusValleyMngmtSvc	One Legal LLC	22005188-CMS-Atty Svc for Court Filing-248880 Parra De La ...	21.36	23.36
Credit ...	03/25/2024	22524209	CitrusValleyMngmtSvc	One Legal LLC	22524209-Joint stmnt of case,Ntc posting JF-Atty Svc for Cou...	173.73	197.09
Credit ...	03/25/2024	22525129	CitrusValleyMngmtSvc	One Legal LLC	22525129-Joint stmnt of case,Ntc posting JF-Atty Svc for Cou...	173.73	370.82
Credit ...	06/10/2024	23069947	CitrusValleyMngmtSvc	One Legal LLC	23069947-248880-Atty Svc for Court Filing-Stip and Order,PO...	39.89	410.71
Credit ...	06/21/2024	23141498	CitrusValleyMngmtSvc	One Legal LLC	23141498-248880-Atty Svc for Court Filing-Joint Stmt of Case...	27.54	438.25
Credit ...	06/21/2024	23141699	CitrusValleyMngmtSvc	One Legal LLC	23141699-248880-Atty Svc for Court Filing-Joint Stmt of Case...	27.54	465.79
Credit ...	07/15/2024	23221611	CitrusValleyMngmtSvc	One Legal LLC	23221611-248880-Atty Svc for Court Filing-Prelim,Declara,Pr...	87.25	553.04
Credit ...	06/28/2024	23221612	CitrusValleyMngmtSvc	One Legal LLC	23221612-248880-Atty Svc for Court Filing-Motion for Prelim ...	61.77	614.81
Credit ...	07/16/2024	23323203	CitrusValleyMngmtSvc	One Legal LLC	23323203-248880-Atty Svc for Court Filing-Prop Ord,POS-Cit...	24.45	639.26
Credit ...	07/15/2024	23323204	CitrusValleyMngmtSvc	One Legal LLC	23323204-248880-Atty Svc for Court Filing-Prop Ord,POS-Cit...	51.48	690.74
Credit ...	07/24/2024	23376174	CitrusValleyMngmtSvc	One Legal LLC	23376174-248880-Atty Svc for Court Filing-Notice-CitrusValle...	25.48	716.22
Credit ...	07/23/2024	23377134	CitrusValleyMngmtSvc	One Legal LLC	23377134-248880-Atty Svc for Court Filing-Notice-CitrusValle...	2.06	718.28
Credit ...	08/01/2024	23404603	CitrusValleyMngmtSvc	One Legal LLC	23404603-Atty Svc for Court Filing-POS, Stip & Ord-CitrusVall...	47.10	765.38
Credit ...	08/06/2024	23438762	CitrusValleyMngmtSvc	One Legal LLC	23438762-248880-Atty Svc for Court Filing-POS-CitrusValley...	19.30	784.68
Credit ...	08/06/2024	23463336	CitrusValleyMngmtSvc	One Legal LLC	23463336-248880-Atty Svc for Court Filing-Joint Stmt of Case...	27.54	812.22
Credit ...	09/06/2024	23675695	CitrusValleyMngmtSvc	One Legal LLC	23675695-248880-Atty Svc for Court Filing-Amended,Declara...	29.60	841.82
Credit ...	09/06/2024	23675696	CitrusValleyMngmtSvc	One Legal LLC	23675696-248880-Atty Svc for Court Filing-Amended,Declara...	77.21	919.03
Credit ...	10/22/2024	23969069	CitrusValleyMngmtSvc	One Legal LLC	23969069-248880-Atty Svc for Court Filing-Joint Stmt-CitrusV...	28.19	947.22
Credit ...	11/07/2024	24096522	CitrusValleyMngmtSvc	One Legal LLC	24096522-248880-Atty Svc for Court Filing-Prop Ord,Declara...	31.28	978.50
Credit ...	12/02/2024	24235093	CitrusValleyMngmtSvc	One Legal LLC	24235093-248880-Atty Svc for Court Filing-Declara,POS-Citru...	30.25	1,008.75
Total 501500 · Court Filing Fees						1,008.75	1,008.75
Total 500000 · COS						1,008.75	1,008.75
TOTAL						1,008.75	1,008.75

Expenses Subtotals - Filtered Exp. Type

As of 2025-03-24 15:55:40 Pacific Standard Time/PST • Generated by Jeanette Heredia

Filtered By
Show: All matters
Matter: ID equals a0L5G00000Yposx
Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Silvia Parra - Wage & Hour: 1/26/2023	E108 — Postage	12/12/2023	E-3165129			\$0.87			\$0.87
		8/16/2023	E-3138507			\$7.66			\$7.66
		8/16/2023	E-3138500			\$7.66			\$7.66
		8/16/2023	E-3138499			\$7.66			\$7.66
		8/16/2023	E-3138490			\$7.90			\$7.90
	Subtotal	Sum				\$31.75	\$0.00	\$0.00	\$31.75
		Count	5						
Subtotal	Sum				\$31.75	\$0.00	\$0.00	\$31.75	
	Count	5							
Total	Sum				\$31.75	\$0.00	\$0.00	\$31.75	
	Count	5							

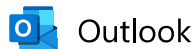
Expenses Subtotals - Filtered Exp. Type

As of 2025-03-24 15:58:57 Pacific Standard Time/PST • Generated by Jeanette Heredia

Filtered By
Show: All matters
Matter: ID equals a0LPc000000mvVS
Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Silvia Parra - Wage & Hour: //	DTF	6/7/2024	E-3225526		Docusign envelope	\$1.89			\$1.89
	Subtotal	Sum				\$1.89	\$0.00	\$0.00	\$1.89
		Count	1						
Subtotal		Sum				\$1.89	\$0.00	\$0.00	\$1.89
		Count	1						
Total		Sum				\$1.89	\$0.00	\$0.00	\$1.89
		Count	1						

EXHIBIT 2



Thank you for your Proposed Settlement Submission

From DIR PAGA Unit <no-reply@formassembly.com>

Date Tue 3/25/2025 8:53 PM

To Lisa Iturriaga, Esq. <lisa.iturriaga@wilshirelawfirm.com>

[You don't often get email from no-reply@formassembly.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

03/25/2025 08:53:15 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: [http://labor.ca.gov/Private Attorneys General Act.htm](http://labor.ca.gov/Private_Attorneys_General_Act.htm)

EXHIBIT 3

1 John G. Yslas (SBN 187324)
2 jyslas@wilshirelawfirm.com
3 Diego Aviles (SBN 315533)
4 daviles@wilshirelawfirm.com
5 Harry Erganyan (SBN 333091)
6 herganyan@wilshirelawfirm.com
7 Mariam M. Nazaretyan (SBN 334154)
8 mnazaretyan@wilshirelawfirm.com
9 John Brown (SBN 233605)
10 jbrown@wilshirelawfirm.com
11 **WILSHIRE LAW FIRM**
12 3055 Wilshire Blvd., 12th Floor
13 Los Angeles, California 90010
14 Telephone: (213) 381-9988
15 Facsimile: (213) 381-9989

16 *Attorneys for Plaintiff*

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

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

21 *Plaintiff,*

22 v.

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

26 *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.

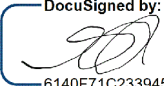
23 11. Standing up for myself and the rights of others was not an easy decision, and I am
24 relieved that this is coming to an end. I estimate that I spent at least 49 hours on this case between
25 my initial consultation, gathering of necessary documents, review of records and further
26 consultations 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.

12. I did not make the decision to file a class action lightly. I was concerned by the attention a publicly filed lawsuit, and especially a class action, would attract. My name would be associated with a lawsuit that I filed against my former employer. I was aware that it is possible to perform background checks of publicly filed documents on the Internet, sometimes with nothing more than a simple Google search. I am mindful that employers might find out that I sued a former employer, and this could hurt my employability.

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:

6140F71C2339454...
SILVIA PARRA DE LA CRUZ