

Joanna Ghosh (SBN 272479)  
Daniel Bass (SBN 287466)  
Brian St. John (SBN 304112)  
**LAWYERS for JUSTICE, PC**  
450 North Brand Blvd., Suite 900  
Glendale, California 91203  
Tel: (818) 265-1020 / Fax: (818) 265-1021

*Attorneys for Plaintiff Diana Rodriguez*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA BARBARA**

DIANA RODRIGUEZ, individually, and on  
behalf of other members of the general public  
similarly situated and on behalf of other  
aggrieved employees pursuant to the California  
Private Attorneys General Act,

Plaintiff,

vs.

VISITING NURSE & HOSPICE CARE, an  
unknown business entity; VISITING NURSE &  
HOSPICE CARE OF SANTA BARBARA, a  
California corporation; VNA HEALTH, an  
unknown business entity; PERSONAL CARE  
SERVICES, an unknown business entity; and  
DOES 1 through 100, inclusive,

Defendants.

Case No.: 22CV05104

Honorable Donna D. Geck  
Department 4

**CLASS ACTION**

**DECLARATION OF DIANA  
RODRIGUEZ IN SUPPORT OF  
PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT, CLASS COUNSEL  
FEES PAYMENT, LITIGATION  
EXPENSES, AND CLASS  
REPRESENTATIVE SERVICE  
PAYMENT**

Date: July 10, 2026  
Time: 10:00 a.m.  
Department: 4

Complaint Filed: December 21, 2021  
FAC Filed: February 6, 2025  
Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

1. I am over 18 years of age and a resident of Arizona. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

3. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for its practice of not properly compensating its employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers for Justice, PC discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff, class representative, and PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

4. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

//

1           5.     Throughout this matter, I was available to answer any questions my attorneys had,  
2 and available to speak and meet with my attorneys whenever they needed me. I responded to  
3 them as quickly as possible and gave them as much information and identified as many  
4 documents as I could. I spent time speaking with my attorneys about the case, identifying  
5 potential witnesses, providing my attorneys with documents and information concerning the  
6 case, and also describing policies, practices, and procedures of Defendant.

7           6.     As far as the settlement is concerned, I was available to review documents and  
8 answer any questions my attorneys had. I reviewed the Class Action and PAGA Settlement and  
9 Release Agreement discussed the questions I had regarding the potential settlement with my  
10 attorneys before signing the settlement papers.

11          7.     I understand that a settlement has been reached in my case and what my duties  
12 and responsibilities are as a class. For example, I am aware that the settlement was granted  
13 preliminary approval, meaning the Court certified a class for settlement purposes, and  
14 conditionally appointed me as the representative of the class and my attorneys as counsel for the  
15 class. I also understand that my duties have and will include checking in on, monitoring, and  
16 conferring with my attorneys to facilitate the notice and settlement administration process, and  
17 to provide information that the Court needs in order to assess whether the settlement is fair,  
18 reasonable, and adequate. Further, if any individuals who are potential class members contact  
19 me, I will take steps to have them referred to the Court-appointed settlement administrator so  
20 that these individuals may receive the necessary information and notice they may be eligible to  
21 receive in connection with the settlement and contemplated final approval hearing.

22          8.     I believe that I have done everything that my attorneys have asked of me and have  
23 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class  
24 members and the State of California with respect to aggrieved employees. I have volunteered to  
25 represent and champion the interests of many other people with similar claims and injuries  
26 because of the importance of the case and the necessity that all class members and aggrieved  
27 employees benefit from the lawsuit equally. I understand that as the class representative I have  
28 and continue to represent the interests of all members of the class in litigation to recover relief  
for the class. As an hourly-paid non-exempt employee of Defendant who was subject to the

1 same policies, practices, and procedures as the other members of the class, I have claims that  
2 are typical of those of the class. I consider the interests of the class just as I would consider my  
3 own interests. I understand that I may need to put the interests of the class before my own  
4 interests, although I have no reason to believe that my interests are in conflict with the interests  
5 of the class. I understand that any resolution of the lawsuit is subject to court approval and must  
6 be in the best interest of the class and aggrieved employees as a whole. I have participated, and  
7 continue to participate, in the lawsuit as necessary. I have actively followed and monitored the  
8 progress of the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the  
9 skilled and effective attorneys that I have retained.

10 9. I think my efforts helped to get the result obtained in this matter, and as the  
11 conditional class and PAGA representative, I respectfully request that the Court award me the  
12 requested Class Representative Service Payment of \$7,500 for my efforts in pursuing and  
13 participating in this matter, as well as my broader release of claims. Taking into consideration  
14 the time that I have dedicated to this matter, I believe that this amount is reasonable.

15 10. I am not related to anyone associated with Lawyers for Justice, PC or the Court  
16 appointed Settlement Administrator, Simpluris, Inc.

17 11. I have not entered into any undisclosed agreements, nor have I received any  
18 undisclosed compensation in this matter. The only compensation I will receive is whatever  
19 amount the Court awards as a Class Representative Service Payment, as well as my share of the  
20 settlement as a class member and aggrieved employee.

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

06/12/2026

23 Executed this \_\_\_\_ day of June 2026, at Scottsdale, Arizona.

24 Electronically Signed 2026-06-12 20:48:56 UTC - 98.177.215.98  

Diana Rodriguez

Nintex AssureSign® 19e2cab7-51fe-4446-85eb-b4660168a05

25 Diana Rodriguez