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

LOLITA GALVAN, 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.

INLAND RESPITE, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. CVRI2103857

Honorable Harold W. Hopp
Department 1

CLASS ACTION

**DECLARATION OF PLAINTIFF LOLITA
GALVAN IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: May 12, 2025
Time: 8:30 a.m.
Department: 1

Complaint Filed: August 24, 2021
FAC Filed: December 16, 2024
Trial Date: None Set

DECLARATION OF LOLITA GALVAN

I, Lolita Galvan, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case and the case entitled *Lolita Galvan v. Inland Respite, Inc.*, Riverside County Superior Court Case No. CVRI2103857. 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.

2. I was employed by Inland Respite, Inc. ("Defendant") from approximately March 2017 to approximately November 2017 as an hourly-paid Respite Assistant. 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 not properly compensating their 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 and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a 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, a PAGA representative, 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.

3. 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 and 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.

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1 4. 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 them
3 as quickly as possible and gave them as much information and identified as many documents as I
4 could. I spent time speaking with my attorneys about the case, identifying potential witnesses,
5 providing my attorneys with documents and information concerning the case, and also describing
6 policies, practices, and procedures of Defendant.

7 5. As far as the settlement is concerned, I was available to review documents and
8 answer any questions my attorneys had. I reviewed the settlement agreement and discussed the
9 potential settlement with my attorneys before signing the settlement agreement.

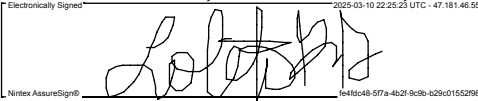
10 6. I think my efforts helped to get the result obtained in this matter, and as a potential
11 class and PAGA representative, I respectfully request that the Court award me an enhancement
12 award for my efforts in pursuing and participating in this matter, as well as my broader release of
13 claims. Taking into consideration the time that I have dedicated to this matter, I believe that this
14 amount is reasonable.

15 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
18 the Court awards as an enhancement award, as well as my share of the settlement as a class member
19 and aggrieved employee.

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

22 Executed this ^{03/10} day of March 2025, at Forest Falls, California.

23 The image shows an electronic signature of Lolita Galvan. The signature is written in black ink on a white background. Above the signature, the text "Electronically Signed" is visible. To the right of the signature, the date and time "2025-03-10 22:25:23 UTC - 47:18:46:55" are displayed. Below the signature, the text "Nintex AssureSign®" is visible.

24 Lolita Galvan