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Beverly Hills, California 90211
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Attorneys for Plaintiff JEANNE BOUDREAU, individually
and on behalf of others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO

JEANNE BOUDREAU, individually and on
behalf of others similarly situated and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act,

Plaintiff,

vs.

INTELLISWIFT SOFTWARE, INC.; and
DOES 1 through 25, inclusive,

Defendants.

Case No.: CGC-23-611128

Honorable Jeffery S. Ross
Department 613

**DECLARATION OF PLAINTIFF JEANNE
BOUDREAU IN SUPPORT OF MOTION
FOR APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: April 30, 2026
Time: 9:00 a.m.
Dept: 613

Complaint Filed: December 15, 2023
FAC Filed: November 7, 2024
SAC Filed: December 22, 2025
Trial Date: Not Set

DECLARATION OF JEANNE BOUDREAU

I, Jeanne Boudreau, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. 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.

2. I was employed by Defendant Intelliswift Software, Inc. (“Defendant”) as an hourly-paid, non-exempt Executive Assistant from approximately September 2022 to approximately January 2023.

3. Because I thought the practices at Defendant may not be lawful, I decided to seek legal advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, for non-compliant meal and rest breaks, and unreimbursed business expenses. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with Defendant, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Defendant.

5. 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. I made myself available to answer any questions my attorneys had about Defendant's practices and treatment of its employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could. I also assisted their efforts to prepare for mediation.

1 6. I knew that Defendant's policies and practices were uniform as to all Class Members
2 through which Defendant denied myself and other Class Members compliant meal and rest periods,
3 required us to perform work off-the-clock without compensation, failed to fully compensate us for all
4 time actually worked, including minimum and overtime wages, and failed to reimburse us for business
5 related expenses. During my employment with Defendant, I learned Defendant's written and non-
6 written operations and employment policies, procedures, and practices. It was my understanding,
7 based on what I was told and experienced, that Defendant maintained and applied the same employee
8 handbooks, payroll, timekeeping, and wage and hour policies and practices to all of its hourly paid,
9 non-exempt employees in California. Accordingly, these common issues predominate over any
10 individual issues affecting myself and the other Class Members. Additionally, as provided below, I
11 believe that I present common issues that are typical of the Class.

12 7. I believe my claims are typical of the Class because Defendant engaged in a pattern
13 and practice of wage abuse against its non-exempt employees, such as requiring myself and the other
14 Class Members to work off-the-clock without compensation, failing to properly pay overtime wages
15 and minimum wages for all hours worked, failing to provide all meal and rest breaks to which we were
16 entitled and failing to pay meal and rest break premiums when due, failing to timely pay wages during
17 employment and upon termination of employment, failing to provide accurate wage statements, and
18 failing to reimburse necessary business-related expenses. For example, I and the other Class Members
19 were required to work off-the-clock, including during our meal periods, in order to meet Defendant's
20 work demands. Similarly, just as with our lunch breaks, the heavy workload and prioritization of
21 productivity precluded the other Class Members and me from taking rest breaks.

22 8. I understood that in the event this matter did not settle and proceeded with trial, I would
23 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
24 responsibilities that are necessary for this lawsuit.

25 9. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
26 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
27 also understood there was a risk of losing any job and/or income due to the time that I would have to
28 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In

DECLARATION OF JEANNE BOUDREAU

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20 work demands. Similarly, just as with our lunch breaks, the heavy workload and prioritization of
21 productivity precluded the other Class Members and me from taking rest breaks.

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23 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
24 responsibilities that are necessary for this lawsuit.

25 9. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
26 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
27 also understood there was a risk of losing any job and/or income due to the time that I would have to
28 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In

1 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
2 claim or take the risk that I took in bringing this action.

3 10. I reviewed the settlement agreement, discussed the settlement agreement with my
4 attorneys, and asked them questions before signing it.

5 11. I believe that I have done everything that my attorneys have asked of me and tried, to
6 the best of my ability, to seek relief for the Class, the PAGA Group Members, and the State of
7 California. I have spent approximately 45-50 hours participating in this case as described above. I
8 believe my efforts helped get the result obtained in this case.

9 12. I understand that any resolution of this lawsuit on a class wide basis is subject to court
10 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
11 throughout the course of this litigation I have considered the interests of the Class and put them before
12 my own personal interests. I am aware that if the settlement is granted preliminary approval, the Court
13 will certify the Class for settlement purposes, and likely appoint me as the representative of the Class
14 and my attorneys as counsel for the Class. I understand that I will need to check in on, monitor, and
15 speak with my attorneys to facilitate the notice and settlement administration process, and to provide
16 information if the Court needs additional information to assess if the settlement is fair, reasonable, and
17 adequate. Further, if Class Members contact me, I will take steps to refer them to the Settlement
18 Administrator so that they can obtain whatever information and notice that may be eligible to receive
19 in connection with the settlement and the contemplated final approval hearing. Accordingly, I believe
20 I have and will adequately represent the Class.

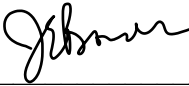
21 13. I understand that incentive or enhancement awards are discretionary and intended to
22 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
23 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
24 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
25 my work in this matter is meritorious on these points for the reasons set forth above.

26 14. I respectfully request that the Court approve and award me an Enhancement Payment
27 in the amount of \$10,000.00 for my efforts and active participation in the case and for the broader,
28 general release of all claims that I have or may have against Defendant in connection with the

1 settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount
2 is reasonable.

3 15. I am not related to anyone associated with Blackstone Law, APC.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. Executed on 12/02/2025, at Sunnyvale, California.

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8 Jeanne Boudreau
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