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LUIS GERMAN CARDENAS PALOMO

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CRUZ

LUIS GERMAN CARDENAS PALOMO, an
individual, on his own behalf and on behalf of
all others similarly situated,

Plaintiffs,

vs.

JA HOLDINGS, INC. DBA VALLEY
HAVEN, a California corporation; ARCILLA
INVESTMENTS, INC. DBA LIVE IN
SERENITY, a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

CASE NO.: 2302655

**DECLARATION OF PLAINTIFF LUIS
GERMAN CARDENAS PALOMO IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Judge: Hon. Marjorie Laird Carter

Date: September 1, 2026

Time: 8:30 AM

Dept.: 10

Complaint Filed: November 7, 2023

DECLARATION OF LUIS GERMAN CARDENAS PALOMO

I, Luis German Cardenas Palomo, hereby declare:

1. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I am the named Plaintiff in this action. On or around November 7, 2023, the Class Action Complaint entitled *Palomo v. JA Holdings, Inc. dba Valley Haven et al.*, was filed in the Superior Court of California, Santa Cruz County, on behalf of myself, and all others similarly situated. On November 22, 2023, Plaintiff filed an Amended Complaint adding a cause of action against Defendant JA Holdings, Inc. dba Valley Haven for failure to provide timely off duty meal periods. On June 28, 2024, Plaintiff filed a Second Amended Complaint adding a cause of action against Defendant JA Holdings, Inc. dba Valley Haven pursuant to the Private Attorneys General Act of 2004, Cal. Lab. Code §§2699, et seq. On April 7, 2026, Plaintiff filed a Third Amended Complaint adding Defendant Arcilla Investments, dba Live In Serenity as a Defendant.

3. I was employed by Defendants JA Holdings, Inc. dba Valley Haven and Arcilla Investments, Inc. dba Live In Serenity (collectively "Defendants") as a non-exempt hourly Caregiver employee from 2022 through August 17, 2023.

4. In my Caregiver capacity for Defendants, I was required to work in excess of 8 hours per day and 40 hours per week. However, Defendants failed to pay me my overtime wages owed. Defendants also failed to pay me minimum wages due to their failure to afford compliant meal/rest breaks. Additionally, Defendants did not reimburse me for my personal cell phone expenses. Defendants also failed to provide me with uniforms and maintain my uniforms.

5. I understand that, as a Class Representative, I have a duty to look out for and protect the interest of the Class as a whole. I do not believe, nor do I have any reason to believe, that my interests in this lawsuit are in conflict or in any way antagonistic to the interests of those of my fellow Class Members.

6. As the named Plaintiff in this action, I provided significant assistance to Plaintiff's Counsel in this case. I spent approximately 30 hours relating to this case. Among other things, I

1 participated in several lengthy interviews and phone conferences over a period lasting several
2 months, searched for and produced a significant number of relevant documents, reviewed pleadings
3 in the case, reviewed documents and data provided by Defendants, kept in contact with my
4 attorneys regarding the status of the case, and remotely attended the all-day mediation on July 15,
5 2025. My efforts were instrumental in securing the favorable terms of the Settlement Agreement,
6 which will provide monetary compensation to a Class of approximately 142 Class Members.

7 7. In addition, this case also involved risks for me, such as the risk of having to pay
8 Defendants' costs if we lost. Disregarding these risks, I pursued this case on behalf of the Class to a
9 successful resolution and settlement.

10 8. It is my understanding that based upon my industrious efforts as the Named Plaintiff
11 in this action there is something called a Class Representative Service Payment. I respectfully
12 request that the Court grant this award to me in the amount of \$10,000 in addition to my pro rata
13 share of the settlement fund.

14 I declare under penalty of perjury under the laws of the United States of America and the
15 State of California that the foregoing is true and correct.

16 Executed on June 3, 2026 in ^{Santa cruz}____, California.

17 
18 Luis German Cardenas Palomo