

Thiago M. Coelho, SBN 324715
thiago.coelho@wilshirelawfirm.com
Chumahan B. Bowen, SBN 268136
chumahan.bowen@wilshirelawfirm.com
Jennifer M. Leinbach, SBN 281404
jennifer.leinbach@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Roman Otkupman, CSBN 249423
Roman@OLFLA.com
Nidah Farishta, CSBN 312360
Nidah@OLFLA.com

OTKUPMAN LAW FIRM, A LAW CORPORATION
5743 Corsa Ave., Suite 123,
Westlake Village, CA 91362
Telephone: (818) 293-5623
Facsimile: (888) 850-1310

Attorneys for Plaintiffs, Desiree Saenz and Quiana Boyette

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

QUIANA BOYETTE, individually, and on
behalf of all others similarly situated;

Plaintiffs,

vs.

INCLUSION SPECIALIZED PROGRAMS
LLC, a limited liability company; and DOES 1
through 10, inclusive,

Defendants.

DESIREE SAENZ, on behalf of herself and all
other similarly situated employees, and on
behalf of the general public;

Plaintiffs,

vs.

INCLUSION SPECIALIZED PROGRAM,
LLC, a California Limited Liability Company,
and DOES 1 through 10, inclusive,

Defendants.

Case No. 23STCV29286
[Related Case No. 24STCV05482]

CLASS & REPRESENTATIVE ACTION

**DECLARATION OF PLAINTIFF
QUIANA BOYETTE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT AND PROVISIONAL
CERTIFICATION OF CLASS**

Hearing
Date: April 24, 2026
Time: 11:30 a.m.
Dept.: 10
Judge: Hon. William F. Highberger

DECLARATION OF PLAINTIFF QUIANA BOYETTE

I, Quiana Boyette, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Defendant Inclusion Specialized Programs, LLC. (“Defendant”). I worked for Defendant from approximately October 2022 to July 2023 as a non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendant’s policies and practices that have been alleged as unlawful in the Class Action Complaint and Private Attorneys General Act (“PAGA”) Notice sent to Defendant and the Labor & Workforce Development Agency (“LWDA”).

4. The reason why I pursued this lawsuit was because I was under the impression that I was not being correctly compensated for all of the time that I worked, and I was not given the opportunity to take all of my meal and rest breaks.

5. By originating this lawsuit as one of the named class representatives, I wanted to see a future where Defendant’s policies better protected the working conditions of my co-workers.

6. I understood that it was my duty as a class representative to represent the best interest of the class, understand the claims in the lawsuit, aid my attorneys in their understanding of the facts, and stay up to date on the progress of the case.

7. I have dedicated much of my time and energy into this lawsuit as a class representative. As detailed more fully below, I have spent approximately 21.2 hours on this case. I wanted to be as involved as possible so that my attorneys would be equipped with the tools necessary to reach a positive outcome for me and the other class members.

8. From the initiation of this lawsuit until now, I have spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information.

9. When I would speak with my attorneys, my attorneys and I would discuss my experience as an hourly-paid employee working for Defendant and we were able to identify various instances where I was not paid correctly.

10. Throughout the case, I spent many hours looking for documents in my possession that were related to my employment to send over to my attorneys, including when I first contacted my attorneys before the mediation took place. Additionally, I spent time reviewing various legal documents for my case, including the retainer and settlement agreement and discussed certain terms with my attorneys.

11. Further, I made sure to keep my schedule free on the day that mediation took place so that my attorneys could direct any question or issues towards me.

12. I believe the settlement that was reached is one that is fair and reasonable, and I would recommend that the Court approve it. I am happy that I was able to recover some money through this settlement for myself and all the class members.

13. Making the decision to join this lawsuit was a difficult one; I was concerned by the potential negative attention that I would cause for myself as a result of this public lawsuit. I was afraid that my name would be attached to a public record reflecting that I filed a lawsuit against my former employer. Ultimately, I felt that something needed to be done to recover for some of the losses that me and other class members experienced.

14. I also understand that there was financial risk in bringing this lawsuit. For example, I knew that if I was not successful in this lawsuit that I could potentially be responsible for Defendant's attorneys' fees and costs.

15. I understand that the settlement agreement provides a service payment to me of up to \$10,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, the settlement requires that I enter into a general release, which I understand is broader than the

release that will bind other class members. I am receiving no compensation additional to that provided for in the settlement.

16. Based on my involvement in this case and the benefits provided to my former co-workers, I can say I stood up and took initiative on behalf of those who felt they could not. Suing an employer is not an easy decision, but I was not afraid to take that risk because I knew that the reward of helping out my former co-workers would be worth that risk.

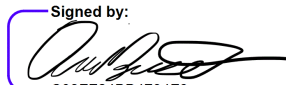
17. I reviewed and signed the Class Action and PAGA Settlement Agreement and Class Notice in full and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendant's defenses.

18. I have no conflict of interest with any class member or the Settlement Administrator, ILYM Group, Inc.

19. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the settlement.

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

Executed on 12/30/2025, at Compton, California.

Signed by:

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 Quiana Boyette