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8 Attorneys for Plaintiff JULIANNA PADILLA

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**

11 PAUL MACIAS and JULIANNA
12 PADILLA, as individuals, on behalf of
13 themselves and all other aggrieved
14 employees,

15 Plaintiffs,

16 vs.

17 TEAM CAR CARE, LLC, a Delaware
18 limited liability company, TEAM CAR
19 CARE WEST, LLC, a Delaware limited
20 liability company, and DOES 2 through 100,
21 Defendants.

Case No.: 24STCV03864

Assigned for all purposes to:
Hon. Steven Cochran, Dept. 16

22 **DECLARATION OF JULIANNA PADILLA**

23 Date: December 11, 2025
24 Time: 9:00 a.m.
25 Dept.: 16

1 **I, JULIANNA PADILLA**, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiffs' Motion for Preliminary Approval of PAGA Settlement.

5 2. I have worked for Defendants Team Car Care, LLC and Team Car Care West, LLC
6 ("Defendants") as an hourly-paid, non-exempt employee, from approximately November 2022 to
7 approximately October 17, 2023. I decided to seek legal advice about my work experiences with
8 Defendants and about pursuing my grievances. I contacted Voskanyan Law Firm, PC and spoke
9 with attorney Harut Voskanyan.

10 3. I decided to file a lawsuit against Defendants because I did not feel that I was treated
11 fairly as an employee of Defendants with regard to not being paid correctly. I wanted to do whatever
12 I could to make sure Defendants were held accountable for not properly compensating their
13 employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse
14 expenses.

15 4. I consulted with my attorney, discussing my situation, complex wage-and-hour class
16 actions and representative actions under the Private Attorneys General Act ("PAGA") in general,
17 and what it meant to be a named plaintiff, and a PAGA representative. I was informed of and came
18 to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative,
19 and also what my duties and responsibilities would be.

20 5. Throughout this matter, I have spent time speaking with my attorney regarding the
21 case and fulfilling my responsibilities as a PAGA representative, which included gathering
22 documents concerning my employment with Defendants, reviewing documents with my attorney,
23 answering questions, providing guidance regarding the duties of other hourly-paid, non-exempt
24 employees, and helping develop a strategy as to what documents and information to obtain from
25 Defendants. I routinely checked in with my attorney to make sure that he had all of my most current
26 information and any additional information that I had obtained.

27 6. Throughout this matter, I was available to answer any questions my attorney had,
28 and available to speak and meet with my attorney whenever he needed me. I responded to him as

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

5 7. As far as the settlement is concerned, I was available to review documents and
6 answer any questions my attorney had. I reviewed the Settlement Agreement and discussed the
7 questions I had regarding the potential settlement with my attorney before signing the settlement
8 papers.

9 8. I understand that a settlement has been reached in my case and what my duties and
10 responsibilities are as a PAGA representative. For example, I understand that my duties will include
11 checking in on, monitoring, and conferring with my attorney to facilitate the notice and settlement
12 administration process, and to provide information that the Court needs in order to assess whether
13 the settlement is fair, reasonable, and adequate. Further, if any individuals who are potential
14 aggrieved employees contact me, I will take steps to have them referred to the Court-appointed
15 settlement administrator so that these individuals may receive the necessary information and notice
16 they may be eligible to receive in connection with the settlement.

17 9. I believe that I have done everything that my attorney has asked of me and have tried,
18 to the best of my ability, to represent and pursue relief on behalf the State of California with respect
19 to aggrieved employees. I have volunteered to represent and champion the interests of many other
20 people with similar claims and injuries because of the importance of the case and the necessity that
21 all aggrieved employees benefit from the lawsuit equally. I understand that as a PAGA
22 representative, I have and continue to represent the interests of all members of the litigation to
23 recover relief. As an hourly-paid, non-exempt employee of Defendants who was subject to the same
24 policies, practices, and procedures as the other aggrieved employees, I have claims that are typical
25 of those of the aggrieved employees. I consider the interests of those employees, as well as the State
26 of California, just as I would consider my own interests. I understand that I may need to put the
27 interests of the other aggrieved employees and the State of California before my own interests,
28 although I have no reason to believe that my interests are in conflict with the interests of them. I

1 understand that any resolution of the lawsuit is subject to court approval and must be in the best
2 interest of the State of California and the other aggrieved employees as a whole. I have participated,
3 and continue to participate, in the lawsuit as necessary. I have actively followed and monitored the
4 progress of the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the
5 skilled and effective attorney that I retained.

6 10. I think my efforts helped to get the result obtained in this matter, and as a PAGA
7 representative, I respectfully request that the Court award me an enhancement award of \$5,000.00
8 for my efforts in pursuing and participating in this matter. Taking into consideration the time that I
9 have dedicated, and will continue to dedicate, to this matter, I believe that this amount is fair and
10 reasonable.

11 I declare under penalty of perjury under the laws of California that the foregoing is true
12 and correct. Executed on 08/15/25, at Cathedral city, California.

13
14 

Julianna Padilla (Aug 15, 2025 10:46:21 PDT)

Julianna Padilla