

1 **JUSTICE FOR WORKERS, P.C.**

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7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF ALAMEDA**

10
11 MICHAEL CASTRO, an individual and on
12 behalf of all others similarly situated;

13 Plaintiff,

14 vs.

15 BRITE NITES, INC., an Utah corporation; and
16 DOES 1 through 50,

17 Defendants.

Case No.: 24CV061873

[Assigned for All Purposes to:
Hon. Somnath Raj Chatterjee, Dept. 21]

**DECLARATION OF SILVIA R.
ARGUETA IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

(Filed concurrently with Motion for
Preliminary Approval; Supporting
Declarations; and [Proposed] Order)

DATE: May 12, 2026

TIME: 2:30 p.m.

DEPT: 21

RESERVATION ID: 042911514321

Action Filed: January 30, 2024

Trial Date: Not Set

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I, Silvia R. Argueta, declare as follows:

1. I am an individual over the age of 18. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am employed as the Executive Director for Legal Aid Foundation of Los Angeles ("LAFLA"), a nonprofit organization exempt from federal income taxes under Section 501(c)(3) of the Internal Revenue Code. My business address is 1550 W 8th Street, Los Angeles, CA 90017. My business phone number is 323-801-7906.

3. I submit this declaration in support of Plaintiff Michael Castro's Motion for Preliminary Approval of Class Action and PAGA Settlement in the above captioned matter and in support of the Parties' selection of LAFLA as the cy pres beneficiary in this case.

4. LAFLA has a staff of 275 staff, including 110 attorneys, with five offices (Central Los Angeles, South Los Angeles, East Los Angeles, Long Beach and Santa Monica), four self-help centers, three domestic violence clinics and five Medical Legal Partnership Clinics. As LAFLA's Executive Director, I oversee strategy, advocacy, fund development, and finance.

5. Founded in 1929, Legal Aid Foundation of Los Angeles is a nonprofit law firm that protects and advances the rights of the most underserved – leveling the play field and ensuring that everyone can have access to the justice system. LAFLA helps more than 100,000 people annually in civil legal matters by providing free direct legal representation and other legal assistance for people living in poverty across greater Los Angeles County.

6. LAFLA works to provide clients with access to fundamental services: food, housing, employment, safety and security. Our client services range from assistance with employment matters including wage and hour, and discrimination issues to housing matters and eviction defense, relief from domestic violence, and government benefits. LAFLA has five workgroups including Housing and Communities, Economic Stability, Supporting Families, Eviction Defense Center, and two specialty projects: Asian & Pacific Islander Community Outreach Project and the Veterans Justice Center. LAFLA takes great pride in having one of the most culturally and linguistically diverse staff in the legal services community, in one of the most diverse cities in the

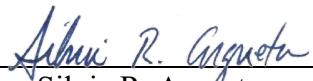
1 country.

2 7. LAFLA's employment work centers on promoting the rights of working people to a
3 safe, living wage job, free from discrimination and harassment, and assisting low-wage workers with
4 a range of work place issues including payment of wages, meal and rest break violations, access to
5 unemployment benefits, and discrimination based on citizenship and immigration status.

6 8. Through community education, advocacy, self-help assistance, and community
7 collaborations, our attorneys strive to empower low-wage workers to fight for their rights in the
8 workplace. Legal representation and assistance is provided to workers from various industries
9 including, but not limited to, construction, restaurant, garment, domestic work, janitorial, security,
10 and car wash services throughout Los Angeles County. In providing such support, LAFLA has
11 weekly walk-in self help clinics where aggrieved employees can speak with an attorney without
12 making an appointment and maintains hotlines in Spanish, Korean, Chinese, Japanese and
13 Vietnamese languages.

14 9. LAFLA will use the *cy pres* funds, to support its mission of protecting the rights of
15 employees to fair wages including the protection of minimum wage and overtime wages as well as
16 the protection of workers to safe, living wage jobs. Any amount paid to the Legal Aid Foundation
17 of Los Angeles as a *cy pres* award will be used to promote justice for all Californians,
18 particularly those without the financial means to hire private counsel for urgent employment
19 legal problems.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct, and that this declaration was executed on January 5, 2026 in Los Angeles,
22 California.

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24 
25 Silvia R. Argueta
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