

Karen I. Gold (State Bar No. 258360)
kgold@blackstonepc.com
Sara Pezeshkpour (State Bar No. 260240)
spezeshkpour@blackstonepc.com
Noam Y. Reiffman (SBN 299446)
nreiffman@blackstonepc.com
Marissa A. Mayhood (State Bar No. 334376)
mmayhood@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Telephone: (310) 622-4278/ Fax: (855) 786-6356

Attorneys for Plaintiffs BRITTNI AGHEDO and
IEASHA PETERS, individually and on behalf of
others similarly situated, and JIMMY QUEVEDO,
individually, on behalf of others similarly situated
and aggrieved employees pursuant to the California
Private Attorneys General Act
(Additional Counsel on Following Page)

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

BRITTNI AGHEDO and IEASHA PETERS,
individually and on behalf of others similarly
situated, and JIMMY QUEVEDO,
individually, on behalf of others similarly
situated and aggrieved employees pursuant to
the California Private Attorneys General Act

Plaintiff,

vs.

VILLA ESPERANZA SERVICES, a
California 501(c)(3) non-profit organization;
and DOES 1 through 25, inclusive,

Defendants.

Case No. 23STCV27362

*Assigned for All Purposes to the Honorable Carolyn
B. Kuhl, Dept. SS-12*

**DECLARATION OF IEASHA PETERS IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: July 2, 2025
Time: 10:00 a.m.
Dept.: SS-12

[Filed Concurrently with Motion for Preliminary
Approval of Class & PAGA Settlement; Plaintiffs'
Declarations; Hartranft Declaration; Gold
Declaration; Haines Declaration; and Proposed
Order]

Complaint Filed: November 6, 2023
FAC Filed: March 13, 2025

1 Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
2 Sean M. Blakely (State Bar No. 264384)
sblakely@haineslawgroup.com
3 **HAINES LAW GROUP, APC**
4 2155 Campus Drive, Suite 180
El Segundo, California 90245
5 Telephone: (424) 292-2350/ Fax: (424) 292-2355

6 Attorneys for Plaintiffs BRITTNI AGHEDO and
7 IEASHA PETERS, individually and on behalf of
others similarly situated, and JIMMY QUEVEDO,
8 individually, on behalf of others similarly situated
and aggrieved employees pursuant to the California
9 Private Attorneys General Act

DECLARATION OF IEASHA PETERS

I, Ieasha Peters, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am one of the named plaintiffs 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 am a former employee of Villa Esperanza Services, Inc. ("Villa Esperanza"). I worked for Villa Esperanza as an hourly-paid, nonexempt instructional aide from approximately March 2017 to approximately December 2020.

3. Because I thought the practices at Villa Esperanza may not be lawful, I decided to pursue a lawsuit against the company. I wanted to take steps to make sure Villa Esperanza was held accountable for not properly compensating its employees for all hours worked and for noncompliant meal and rest breaks. After speaking with 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, and what it meant to bring a class 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 representative. This process included searching for and providing documents concerning my employment with Villa Esperanza, answering any questions my attorneys had about the several positions that I held at Villa Esperanza, documents, providing information regarding the company's practices and the duties of other non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Villa Esperanza.

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 Villa Esperanza'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.

6. I understood that in the event this matter did not settle and proceeded to trial, I would

1 need to respond to discovery, attend a deposition, and be in court to participate in the trial. I was ready
2 to perform that role, as well as fulfill any other responsibilities necessary for this lawsuit.

3 7. I took a considerable risk by bringing and pursuing this lawsuit for several reasons.
4 First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also
5 understood there was a risk of losing any current job and/or income due to the time that I would have
6 to spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed.
7 Most importantly, I believe that by pursuing this case, I have taken a significant risk because future
8 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
9 to find employment within this industry – and even outside of it – in the future. In contrast, the other
10 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
11 that I took in bringing this action

12 8. I reviewed the settlement agreement, discussed the settlement agreement with my
13 attorneys, and asked them questions before signing it.

14 9. I believe that I have done everything that my attorneys have asked of me and tried, to
15 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
16 In total, I have spent approximately 30 to 34 hours participating in this case as described above. I
17 believe my efforts helped get the result obtained in this case.

18 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
19 approval, and any settlement must be in the best interest of the Class as a whole. At all times throughout
20 the course of this litigation I have considered the interests of the Class and put them before my own
21 personal interests

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

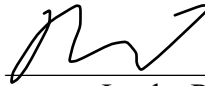
27 12. I respectfully request that the Court approve an Enhancement Payment in the amount
28 of \$7,500.00 for my efforts and active participation in the case and for the broader, general release of

1 all claims that I have or may have against Villa Esperanza in connection with the settlement. Taking
2 into consideration the time that I dedicated to this case and favorable terms of the settlement, I believe
3 that this amount is reasonable.

4 13. I understand that Blackstone Law, APC and Haines Law Group, APC will share the
5 attorneys' fees in this matter. I agreed to this in writing. I understand that the amount of attorneys'
6 fees will not increase as a result of this fee sharing.

7 14. I am not related to anyone associated with Blackstone Law, APC.
8

9 I declare under penalty of perjury under the laws of the State of California that the foregoing
10 is true and correct. Executed on 04/23/2025, at Fontana, California

11
12 

13 Ieasha Peters
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28