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Jimmy Quevedo and the Class

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

BRITTNEI 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

Honorable Carolyn B. Kuhl
Department SS12

**DECLARATION OF BRITTNEI AGHEDO IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT, ATTORNEYS' FEES AND
COSTS, ENHANCEMENT PAYMENTS, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: November 4, 2025
Time: 10:30 a.m.
Dept: 12

Complaint Filed: November 6, 2023
FAC Filed: March 13, 2025
Trial Date: Not Set

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7 Jimmy Quevedo and
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DECLARATION OF BRITTNI AGHEDO

I, Brittni Aghedo, 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 teaching aide, occupational therapy assistant, and receptionist from approximately January 2019 through approximately March 2020 and approximately January 2021 to approximately September 2021.

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.

1 6. I understood that in the event this matter did not settle and proceeded to trial, I would
2 need to respond to discovery, attend a deposition, and be in court to participate in the trial. I was ready
3 to perform that role, as well as fulfill any other responsibilities necessary for this lawsuit.

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

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

15 9. I believe that I have done everything that my attorneys have asked of me and tried, to
16 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
17 In total, I have spent approximately 37 to 40 hours participating in this case as described above. I
18 believe my efforts helped get the result obtained in this case.

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

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

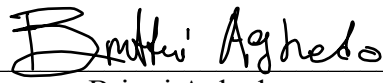
28 12. I respectfully request that the Court approve an Enhancement Payment in the amount

1 of \$7,500.00 for my efforts and active participation in the case and for the broader, general release of
2 all claims that I have or may have against Villa Esperanza in connection with the settlement. Taking
3 into consideration the time that I dedicated to this case and favorable terms of the settlement, I believe
4 that this amount is reasonable.

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

8 14. I am not related to anyone associated with Blackstone Law, APC.
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10 I declare under penalty of perjury under the laws of the State of California that the foregoing
11 is true and correct. Executed on 04/23/2025, at Fontana, California

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14 Brittini Aghedo
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