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*Attorneys for Plaintiff*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SACRAMENTO**

THERESA PELEGRINO, individually, and  
on behalf of other members of the general  
public similarly situated

Plaintiff,

vs.

SACRAMENTO CHILDREN'S HOME, a  
California corporation; and Does 1 through  
100, inclusive,

Defendants.

Case No.: 34-2022-00315912  
Honorable Lauri A. Damrell

**CLASS ACTION**

**DECLARATION OF THERESA  
PELEGRINO IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

[Notice of Motion and Motion for  
Preliminary Approval of Class Action  
Settlement; Declaration of Proposed Class  
Counsel (Brian J. St. John); and [Proposed]  
Order filed concurrently herewith]

Date: June 28, 2024  
Time: 9:00 a.m.  
Department: 22

Complaint Filed: February 23, 2022  
Trial Date: None Set

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I, **Theresa Pelegrino**, hereby declare as follows:

1. I am over 18 years of age and a resident of Illinois. I am the named plaintiff 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 was employed by Sacramento Children's Home as an hourly Child Care Worker from November 2008 to approximately November 2018. I decided to seek legal advice about my work experience with Sacramento Children's Home. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Sacramento Children's Home paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **5 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **8 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff and class representative, and PAGA representative.

3. I have spent over **14 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which has included gathering documents concerning my employment with Sacramento Children's Home, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly-paid and non-exempt employees Child Care Workers and helping develop a strategy as to what documents and information to obtain from Sacramento Children's Home. 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.

4. Throughout the case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to

1 them as quickly as possible and gave them as much information and identified as many  
2 documents as I could. I spent at least **8 additional hours** speaking with my attorneys about the  
3 case, identifying potential witnesses, providing my attorneys with documents and information  
4 concerning the case, and describing policies, practices, and procedures of Sacramento Children's  
5 Home.

6 5. As far as the settlement is concerned, I spent about **2 hours** reviewing the  
7 settlement agreement and about **2 hours** asking questions and discussing the potential settlement  
8 with my attorneys before signing the settlement agreement.

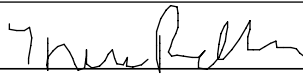
9 6. I believe that I have done everything that my attorneys have asked of me and have  
10 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees  
11 and the State of California. I think my efforts helped to get the result obtained in this case, and  
12 as a class and PAGA representative, I respectfully request that the Court award me an  
13 enhancement payment in the amount of \$7,500.00 for my active participation in this case.  
14 Taking into consideration the time that I have dedicated to this case, I believe that this amount is  
15 reasonable.

16 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

17 8. I have not entered into any undisclosed agreements, nor have I received any  
18 undisclosed compensation in this case. The only compensation I will receive is whatever amount  
19 the Court awards as an enhancement award, as well as my share of the settlement as a class  
20 member and as an aggrieved employee.

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

23 Executed on this day 06/05/2024, at Toulon, Illinois.

24 Electronically Signed  2024-06-05 20:52:46 UTC - 108.178.201.150  
Nintex AssureSign® 463be679-8668-40d8-88ed-b186014416ca

25 Theresa Pelegrino