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Attorneys for Plaintiff and all aggrieved employees

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

KASSANDRA DIAZ, an individual, on behalf
of the State of California, as a private attorney
general,

PLAINTIFF,

v.

ASCEND HEALTHCARE, LLC; CPE HR,
INC.; and DOES 1 thru 50, inclusive,

DEFENDANTS.

Case No. 24STCV13760

[Case Assigned for All Purposes to Hon. Anne
Richardson in Dept. 40]

DECLARATION OF KASSANDRA DIAZ
IN SUPPORT OF MOTION FOR
APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT

Date: September 24, 2024
Time: 8:30AM
Dept.: 40

Complaint Filed: June 3, 2024
Trial Date: None Set

Reservation No. 316197220348

DECLARATION OF KASSANDRA DIAZ

I, KASSANDRA DIAZ, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and a named Plaintiff in the matter of KASSANDRA DIAZ, on behalf of the State of California, as a private attorney general, v. ASCEND HEALTHCARE, LLC; CPE HR, INC.; and DOES 1 thru 50, inclusive, Los Angeles County Superior Court, Case No. 24STCV13760. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claim and the claims of my co-workers, and in support of my qualifications as the named Plaintiff. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as an employee of ASCEND HEALTHCARE, LLC; CPE HR, INC. (“Defendants”).

3. As an employee of Defendants, I contend that I regularly failed to be paid all wages and/or overtime, failed to receive compliant meal and rest periods, failed to be reimbursed for business-related expenses, failed to receive accurate itemized wage statements, failed to be paid all wages due at the time of my termination/resignation with the company, and was required to sign onboarding documents that contained terms and conditions prohibited by law.

4. I have spent significant time throughout this class action working with Class Counsel. Before entering the action on June 3, 2024, I researched and identified Counsel that I believed had extensive experience with these types of employment claims and could best represent the interests of the aggrieved employees. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Defendants and provided all relevant employment documents in my possession. I participated in discussions with PAGA Counsel and shared my knowledge and insights in order to help obtain a favorable settlement.

5. Throughout the entirety of this litigation, I have maintained regular contact with PAGA Counsel and assisted in any way possible providing information and making myself

available as needed.

6. I was aware that by helping to initiate this lawsuit, my name would become known and it was possible that my involvement in this matter could make it more difficult for me to obtain employment in this field. Regardless, I believed it was important to proceed with this matter on my behalf and on behalf of all others who were subject to the same problems during their employment with Defendants.

7. Based upon my participation in this case, I understand the merits of this settlement and I strongly support the settlement and believe it is fair and reasonable, and in the best interest of the aggrieved employees. I believe this Settlement will benefit the aggrieved employees.

8. It is my opinion that a fair and adequate Class enhancement for me as a named Plaintiff is \$5,000.00. I believe that it is fair and reasonable in view of all of the work I have performed in my role as a named Plaintiff. As a named Plaintiff, I actively participated in all stages of the litigation as detailed above and have always maintained the best interest of the aggrieved employees while performing my named Plaintiff duties.

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

Executed this 14th day of August, 2024 at Sylmar,
California.

DocuSigned by:



7F2692DEED847E...
Kassandra Diaz

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On August 19, 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF KASSANDRA DIAZ IN SUPPORT OF MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Jose-Manuel A. De Castro
jmdecastro@decastrolawgroup.com
DeCastro Law Group, A Professional Corporation
7590 N. Glenoaks Blvd., Suite 201
Los Angeles, CA 91504

Attorneys for Defendant

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 19, 2024, at Encino, California.



Michelle Tanzer