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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE**

DOMINIC PIOTROWSKI, individually, and on
behalf of the State of California and other
aggrieved persons,

Plaintiff,

v.

MORENO VALLEY SNF, LLC, a limited liability
company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: CVRI2400503

*Assigned for all purposes to:
Hon. Harold W. Hopp
Dept. 1*

**DECLARATION OF PLAINTIFF
DOMINIC PIOTROWSKI IN SUPPORT
OF MOTION TO APPROVE PAGA
SETTLEMENT**

PAGA APPROVAL HEARING

Date: April 7, 2026

Time: 8:30 a.m.

Dept: 1

Reservation ID: 393049066878

I, Dominic Piotrowski, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion to Approve PAGA Settlement.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I worked as a non-exempt employee for the Defendant Moreno Valley SNF, LLC ("Defendant"), in Moreno Valley, California, from approximately May 2023, through approximately December 2023. I was paid on an hourly basis. I worked as a Certified Nursing Assistant ("CNA") for Defendant.

4. Throughout the entirety of my employment, I was subject to all of Defendant's policies and practices that have been alleged as unlawful in the Private Attorneys General Act ("PAGA") Notice sent to Defendant and the Labor & Workforce Development Agency ("LWDA") and the First Amended Complaint.

5. I initiated this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks.

6. By originating this lawsuit, I hoped that I might be able to change Defendant's policies to better protect the working conditions of my former co-workers. I also understood that it was my duty to represent the best interests of the aggrieved employees, to be informed about the lawsuit, assist my attorneys, and keep updated on the case.

7. I have invested a lot of personal time and energy into this lawsuit. As detailed more fully below, I have spent approximately 40 hours on this case since I retained my counsel in or around December 2023. I made it a priority to be actively involved because I wanted to do everything I could to assist my attorneys in prosecuting this case.

8. My work on this case has included, among other things, gathering and providing my payroll records and other documents, discussing my claims and potential witnesses, reviewing

1 discovery information and data, communicating on the phone with my attorneys, assisting my
2 attorneys prepare for mediation, making myself available on the day of mediation to my attorneys to
3 answer any questions or issues that may have arisen, reviewing and executing legal documents in
4 this case, including the retainer agreement and settlement agreement, and discussed in detail the
5 terms with my attorneys.

6 9. I believe the settlement is a good settlement and I would recommend that the Court
7 approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had
8 the opportunity to represent the aggrieved employees in this lawsuit as a private attorney general for
9 the State of California, and that I was able to recover money through a settlement for the aggrieved
10 employees.

11 10. I did not make the decision to file this action lightly. I was concerned by the attention
12 a publicly filed lawsuit, and especially a representative action, would attract. My name would be
13 associated with a lawsuit that I filed against my former employer. Additionally, a settlement letter
14 will be mailed to over 330 current and former employees of Defendant. The settlement letter informs
15 all of these employees that I filed a representative action against Defendant. I was and am mindful
16 that exposing myself to this kind of publicity creates a risk for my future career prospects, since
17 current and former employees of Defendant may move to different companies within the industry or
18 may know people at other companies within the industry who may not want to hire someone who
19 sued an employer. Nevertheless, I felt that important rights were at stake that hurt everyone, and
20 something ought to be done about it.

21 11. Additionally, I understood that the lawsuit could continue for several years and
22 require my services and attention throughout the entire length of the lawsuit. I learned that even if
23 we won at trial, the case could be further delayed by appeals. I also understood that there was a
24 financial risk in bringing this lawsuit. I was aware that, as a private attorney general, I might be
25 responsible for some or all of Defendant's legal costs if the case was not successfully concluded.
26 Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other
27 employees and the State of California, but I was nervous about losing and having a judgment filed
28 against me for costs or losing job opportunities in the future.

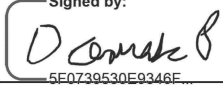
12. The personal benefit I will receive is the same as all other aggrieved employees.

13. Based on my involvement in this case and the benefits provided to the aggrieved employees, I can say I helped stand up for the other workers who were too afraid to say anything to Defendant because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping out the other aggrieved employees.

14. As previously mentioned, I reviewed and ultimately signed the settlement agreement and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the PAGA claims and Defendant's defenses.

15. I have no conflicts of interest with any aggrieved employee or the Settlement Administrator, ILYM Group, Inc.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 12/23/2025, at Moreno Valley, California.

Signed by:

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DOMINIC PIOTROWSKI