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Attorneys for Plaintiff
APRIL THOMASON

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF EL DORADO**

APRIL THOMASON, on behalf of herself, and
all aggrieved employees,

Plaintiff,

v.

SEQUOIA SENIOR LIVING LLC, and DOES
1 through 50, inclusive,

Defendants.

Case No: 24CV0979

REPRESENTATIVE ACTION

**DECLARATION OF APRIL THOMASON
IN SUPPORT OF MOTIONS FOR AN
ORDER APPROVING SETTLEMENT OF
PAGA ACTION AND DISMISSING
ACTION WITH PREJUDICE AND FOR
AN ORDER AWARDING ATTORNEYS'
FEES AND COSTS, ENHANCEMENT
PAYMENT, AND SETTLEMENT
ADMINISTRATION FEES**

Date: TBD

Time: TBD

Dept. 09

Complaint Filed: May 10, 2024

Trial Date: TBD

1 I, APRIL THOMASON, declare as follows:

2 1. I am the named Plaintiff in the case against Sequoia Senior Living LLC (“Sequoia”
3 or “Defendant”). I submit this Declaration in support of Plaintiff’s motion for PAGA approval as
4 well as the motion for attorneys’ fees and costs, enhancement payment, and settlement
5 administration fees. I am a competent adult, I have personal knowledge of the facts set forth in
6 this declaration, and I could and would testify competently under oath if called as a witness.

7 2. Sequoia operates assisted living facilities throughout California. I worked for
8 Sequoia as an hourly caregiver from approximately April 27, 2023 through September 2023. I
9 also worked for Sequoia previously, but that is outside the time frame of this lawsuit.

10 3. I believed it was wrong for Sequoia to not pay me for all of my hours worked, to not
11 provide me with adequate meal and rest periods, and to not reimburse my business expenses.

12 4. Prior to initiating this action, I spoke to my attorney Robert Spencer, Esq. of Keller
13 Grover LLP. I spent over an hour describing to Mr. Spencer the facts of my case. We also discussed
14 the fact that this case would be brought as a PAGA action and what that meant, including that a
15 PAGA action is an enforcement action on behalf of the State of California that seeks penalties.
16 We also discussed my responsibilities as a representative of the aggrieved employees.
17 Additionally, we discussed what litigation was like, including the different stages of litigation, the
18 work it entails, and how long these types of cases take. I then determined that Keller Grover LLP
19 was the proper law firm to bring my case.

20 5. From the inception of this lawsuit, I have understood that this is a PAGA action that
21 is an enforcement action on behalf of the State of California that seeks penalties. I worked with
22 Mr. Spencer to draft the PAGA letter. We spent close to an hour on the telephone to make sure it
23 was factually correct. I also spent an hour reviewing it before it was sent to the LWDA. I also
24 reviewed the complaint after it was drafted, Mr. Spencer provided it to me before it was filed. I
25 spent an hour reviewing it before it was filed to make sure it was accurate.

26 6. Mr. Spencer let me know that he had propounded written discovery on Sequoia and
27 later we discussed Sequoia’s responses.
28

1 7. Mr. Spencer also made me aware that Defendant was open to mediating this action.
2 I kept up to date regarding the mediation and made sure I was available on the date of the mediation
3 in order to answer any questions that Mr. Spencer had. I also had numerous telephone
4 conversations with Mr. Spencer to answer questions he had in order to draft the mediation brief.

5 8. After the mediation was successful, I reviewed the Labor Code Private Attorneys
6 General Act Settlement Agreement (“Settlement Agreement”) with Mr. Spencer and spent
7 approximately half an hour discussing with him regarding how the settlement funds were to be
8 distributed and whether the settlement and the plan of distribution were fair. I then spent another
9 hour reviewing the Settlement Agreement.

10 9. Throughout my involvement in the case, I have maintained regular telephonic
11 communications with Mr. Spencer to discuss the status of the case and to respond to any questions
12 he might have. We speak at least once month, if not more.

13 10. When I agreed to act as a named plaintiff, I understood that I might be responsible
14 for some of the costs incurred by Defendant if the lawsuit was unsuccessful. In addition to this, I
15 worried about my reputation in the community if people were to find out I had sued somebody. I
16 would also have attended trial and testified if the case had reached that point.

17 11. I also am concerned about the possible repercussions to my future job opportunities
18 because I have been a plaintiff in a wage and hour lawsuit against an employer.

19 12. I understood from the beginning that I was pursuing this case not only for my own
20 benefit, but also for the benefit of large numbers of past and present employees and the State of
21 California.

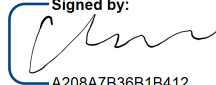
22 13. I believe that the settlement reached in this case is fair and, in light of the risks
23 involved, will justly compensate the State of California and the aggrieved employees. I believe
24 that the enhancement I have requested is fair in light of the work I put into the case, the risks I
25 took, the harm that I believe my suing my employer could cause me in terms of future job
26 prospects, and the benefits that have been achieved for the State of California and the aggrieved
27 employees. I have also provided a general release of my claims.
28

1 14. I understand the settlement we have reached in this case must be approved by the
2 Court and I must protect the interest of the State of California and the aggrieved employees.

3 15. I have no interest in or relationship with the proposed Settlement Administrator,
4 Simpluris, Inc.

5 I declare under penalty of perjury under the laws of the State of California and the United
6 States that the foregoing is true and correct, and that this Declaration was executed on
7 4/18/2025 at Carmichael, California.

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Signed by:

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APRIL THOMASON

PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **April 24, 2025**, in the case of *April Thomason v. Sequoia Senior Living LLC*, El Dorado Superior Court Case Number 24CV0979, I served the foregoing document(s):

DECLARATION OF APRIL THOMASON IN SUPPORT OF MOTIONS FOR AN ORDER APPROVING SETTLEMENT OF PAGA ACTION AND DISMISSING ACTION WITH PREJUDICE AND FOR AN ORDER AWARDING ATTORNEYS' FEES AND COSTS, ENHANCEMENT PAYMENT, AND SETTLEMENT ADMINISTRATION FEES

on the interested party(ies) below, using the following means:

Jeremy Millstone, Esq.

Attorneys for Defendant

Angelea Day

SEQUOIA SENIOR LIVING LLC

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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


JOEY GONZALEZ