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Attorneys for Plaintiff CYNTHIA PORRAZ,
individually, and on behalf of other similarly
situated employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF FRESNO

CYNTHIA PORRAZ, individually, and on
behalf of other similarly situated employees,

Plaintiff,

vs.

QUALITY GROUP HOMES, INC.; and
DOES 1 through 25, inclusive,

Defendants.

Case No.: 24CECG01665
[Consolidated with Case No. CECG02628]

Honorable Kristi Culver Kapetan
Department 501

**DECLARATION OF PLAINTIFF
CYNTHIA PORRAZ IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: July 22, 2026
Time: 3:27 p.m.
Dept: 501

Complaint Filed: April 16, 2024
Trial Date: Not Set

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1 4. My claims are typical of those of the other Class Members. Like me, the other Class
2 Members were employed by Defendant as non-exempt employees and were subject to the same
3 unlawful wage and hour policies and practices described above. The violations I suffered and
4 personally observed other employees suffering – including missed and interrupted meal periods,
5 denied rest breaks, off-the-clock work, inaccurate wage statements, unreimbursed business expenses,
6 and failure to pay all wages during employment and upon separation – are the same violations that
7 other non-exempt employees experienced as a result of Defendant’s uniform policies and practices. I
8 have no interests that are antagonistic to or in conflict with those of the Class Members.

9 5. Because I thought the practices at Defendant may not be lawful, I decided to seek legal
10 advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my
11 grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps
12 to make sure Defendant was held accountable for not properly compensating its employees for all
13 hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also
14 investigated class and representative action lawsuits on my own. Thereafter, I further consulted with
15 the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits
16 under the Private Attorneys General Act (“PAGA”), and what it meant to bring a class and PAGA
17 action so that I understood what I was considering doing.

18 6. I have regularly conferred with my attorneys regarding the case as part of my
19 responsibilities as a class and PAGA representative. This process included searching for and providing
20 documents concerning my employment with Defendant, answering any questions my attorneys had
21 about the documents, providing information regarding the company’s practices and the duties of other
22 non-exempt employees, and helping my attorneys develop a strategy as to what additional documents
23 and information they could seek to obtain from Defendant.

24 7. I routinely checked in with my attorneys and their staff to make sure that they had all
25 of my most current information and any additional information that I had obtained. I made myself
26 available to answer any questions my attorneys had about Defendant’s practices and treatment of its
27 employees whenever they needed me. I responded to them as quickly as possible and gave them as
28 much information as I could.

1 8. I understood that in the event this matter did not settle and proceeded with trial, I would
2 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
3 responsibilities that are necessary for this lawsuit.

4 9. I knowingly and willingly accepted significant personal, professional, and financial
5 risks by stepping forward to bring and pursue this lawsuit. I understood from the outset that if this
6 case were unsuccessful, I could be responsible for paying the costs of the litigation. I also understood
7 that by serving as the named Class Representative, I was exposing myself to potential scrutiny and
8 reputational consequences in my professional community – risks that other Class Members did not
9 face. Beyond the financial risk, I dedicated a substantial amount of my personal time to this case –
10 time I could not spend on other professional or personal obligations – including responding to my
11 attorneys' requests, reviewing documents, and preparing for potential trial participation. I also
12 understood that, as a former employee of Defendant, coming forward as the named Plaintiff carried
13 the risk of being perceived negatively by current or prospective employers in my field. The other
14 employees who stand to benefit from this settlement did not have to bear any of these risks, make any
15 of these sacrifices, or take any action whatsoever to receive their recovery.

16 10. I reviewed the settlement agreement, discussed the settlement agreement with my
17 attorneys, and asked them questions before signing it.

18 11. I believe that I have done everything that my attorneys have asked of me and tried, to
19 the best of my ability, to seek relief for the Class, the Aggrieved Employees, and the State of
20 California. I have spent approximately 50-55 hours actively participating in this case, including
21 gathering and providing documents, meeting and corresponding with my attorneys, helping my
22 attorneys prepare for mediation, reviewing pleadings and the settlement agreement, and remaining
23 prepared to testify at trial if necessary. I believe my efforts helped get the result obtained in this case.

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

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13. I understand that incentive or enhancement awards are discretionary and intended to compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA action, and an acknowledgment of the benefits resulting from the representative's actions. I believe my work in this matter is meritorious on these points for the reasons set forth above.

14. I respectfully request that the Court approve and award me a Class Representative Service Payment in the amount of \$7,500.00 for my efforts and active participation in the case, the personal and professional risks I assumed as the named Plaintiff, and for the broader, general release of all claims that I have or may have against Defendant in connection with the settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

15. I am not related to anyone associated with Blackstone Law, APC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 06/11/2026, at Fresno, California.

Cynthia Porraz

Cynthia Porraz