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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

LUIS MADRIZ-RIVAS, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

GRACE HOLMES, INC., a Delaware
corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 24CV446239

*[Assigned for All Purposes to the Hon. Beth
McGowen, Dept. 22]*

**DECLARATION OF LUIS MADRIZ-
RIVAS IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

PAGA Approval Hearing:

Date: December 10, 2026

Time: 1:30 p.m.

Dept.: 22

Action Filed: August 30, 2024

DECLARATION OF LUIS MADRIZ-RIVAS

I, Luis Madriz-Rivas, declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Approval of PAGA Settlement.

2. I worked for Defendant Grace Holmes, Inc. ("Defendant") as an hourly-paid non-exempt employee from approximately July 2023 to approximately May 2024.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

3. When I decided to become involved in this lawsuit as a private attorney general for the State of California, I understood that I was not only seeking civil penalties on behalf of myself and the State of California, but also for other aggrieved employees who worked for Defendant.

4. I was also made aware that being a private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, acting as a private attorney general, I might be responsible for some or all of Defendant's legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

5. I understood that there were risks involved in representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if I won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

6. As the named plaintiff, I am the face of the litigation. Additionally, a settlement letter will be mailed to approximately 886 current and former employees of Defendant. The settlement letter informs all of these employees that I have filed a representative action against Defendant. Exposing myself to this kind of publicity creates a risk for my future career prospects, since current and former employees of Defendant may move to different companies within the

industry or may know people at other companies within the industry who may not want to hire someone who sued his employer.

Amount of Time and Effort Spent and Duration of the Litigation

7. I have spent a substantial amount of time and effort on this litigation. My work on this case has included, among other things, gathering and providing my employment records, discussing potential witnesses and my experiences working for Defendant, reviewing discovery information and data (as needed), assisting my attorneys prepare for mediation by discussing my claims, being on-call on the day of mediation should any questions or concerns arise, and participating in settlement discussions. After mediation, I remained actively involved by reviewing the settlement papers and regularly contacted my counsel for updates. I estimate that since I retained my counsel in June of 2024, I have spent approximately 25 hours on the activities described above and will spend an additional 1-3 hours wrapping up this action.

Personal Benefit Received as a Result of the Litigation

8. Absent the requested service payment of \$5,000.00, the personal benefit I will receive from this PAGA settlement is the same as all other employees. But unlike the other employees, I have signed a general release under section 1542 of the Civil Code of the State of California. In a separate agreement, I have released my individual claims against Defendant for discrimination, retaliation, wrongful termination, and related claims and allegations. Under this PAGA settlement, the other employees are only releasing their claim for civil penalties under PAGA as asserted in the lawsuit. As such, I respectfully request that the Court grant a service payment of \$5,000.00.

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No Conflicts

9. I have no actual or potential conflict of interest with the Aggrieved Employees in this PAGA Action or with the Settlement Administrator that the Parties agreed to appoint, Phoenix Class Action Administration Solutions.

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

Executed on 7/21/2026, at San Francisco, California.

(City Name)

Signed by:



DD25774712C947A

Luis Madriz-Rivas