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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

LATRIESE CHERI BECKER, LAKEISHA BECKER, ELIZABETH CASTRO, and MAGALI YASMIN MIRANDA-JIMENEZ, on behalf of the State of California and other aggrieved persons,

Plaintiffs,

vs.

ASISTENCIA VILLA POST ACUTE LLC, a California limited liability company; and DOES 1 through 10, inclusive,

Defendants.

DECLARATION OF PLAINTIFF ELIZABETH CASTRO IN SUPPORT OF PLAINTIFFS' MOTION FOR APPROVAL OF PAGA SETTLEMENT

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DECLARATION OF ELIZABETH CASTRO

I, Elizabeth Castro, 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 Plaintiffs' Motion for Approval of PAGA Settlement.

2. I worked for Defendant Asistencia Villa Post Acute LLC ("Defendant") From approximately November 2023 to approximately November 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 a named plaintiff, I am one of the faces of the litigation. 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 nursing industry or may know people at other companies within the nursing industry who may not want to hire someone who sued an employer.

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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 my experiences working for Defendant, and making myself available during 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, I have spent approximately 28 hours on the activities described above.

Personal Benefit Received as a Result of the Litigation

8. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, I have signed a general release of Defendant. The other employees are only releasing their claim for civil penalties under PAGA as asserted in the lawsuit.

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, Apex Class Action LLC.

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 10/30/2026, at San Bernardino, California.

Signed by:
Elizabeth Castro
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Elizabeth Castro