

John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
Eugene Zinovyev (SBN 267245)
eugene.zinovyev@wilshirelawfirm.com
John Brown (SBN 233605)
john.brown@wilshirelawfirm.com
Gabriella Solé (SBN 346164)
gabriella.sole@wilshirelawfirm.com
WILSHIRE LAW FIRM
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiffs Elvira Lara and Breanna
Morris, individually, and on behalf of all others
similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

ELVIRA LARA, an individual; BREANNA
MORRIS, an individual, and on behalf of all
others similarly situated,

Plaintiffs,

v.

3360 MAGNOLIA AVE, INC., a California
corporation; 3360 MAGNOLIA AVE, LLC., a
California limited liability company; and DOES
1 through 10, inclusive,

Defendants.

Case No.: 24STCV05190

*Assigned for all purposes to:
Hon. Carolyn B. Kuhl, Dept. 12*

**DECLARATION OF ELVIRA LARA IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: September 3, 2025
Time: 10:30 a.m.
Dept.: 12

Electronically FILED by
Superior Court of California,
County of Los Angeles
6/24/2025 4:16 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By G. Carini, Deputy Clerk

DECLARATION OF ELVIRA LARA

I, Elvira Lara, hereby 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 Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for 3360 Magnolia Ave., Inc., and Magnolia Ave, LLC (“Defendant” or “3360 Magnolia Ave.”) as an hourly-paid, non-exempt Care Giver and Activities Coordinator from around June 2021 to approximately November 2023.

3. Based on my experience and knowledge of 3360 Magnolia Ave. wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of 3360 Magnolia Ave.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of 3360 Magnolia Ave. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees at 3360 Magnolia Ave.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by 3360 Magnolia Ave. company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by 3360 Magnolia Ave.

7. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the

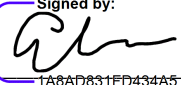
1 other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and
2 information to my attorneys, keeping in regular contact with my attorneys regarding the status of
3 the case, and reviewing the settlement agreement to make sure it was fair.

4 8. I will continue to actively participate in this lawsuit as necessary and will continue to
5 make myself available to assist in this case moving forward as needed.

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

8 Executed on 6/10/2025, 2025, at Carson, California.

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Signed by:

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Elvira Lara, Plaintiff/Declarant