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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

ANNAALICIA LEBLANC, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

O’CONNOR WOODS HOUSING
CORPORATION, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: STK-CV-UOE-2024-0009405

[Assigned to the Hon. Robert T. Waters, Dept. 11B]

**DECLARATION OF ANNAALICIA
LEBLANC IN SUPPORT OF PLAINTIFF’S
MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 6, 2026
Time: 9:00 a.m.
Dept.: 11B

Action Filed: August 7, 2024
Trial Date: None

DECLARATION OF ANNAALICIA LEBLANC

I, Annaalicia LeBlanc, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I worked for Defendant O'Connor Woods Housing Corporation ("Defendant") as a Certified Nursing Assistant from about May 13, 2024, until about July 2024. Throughout my employment with Defendant, I worked as an hourly paid, non-exempt employee.

3. During my employment with Defendant, I was also not provided with off-duty rest breaks. In this regard, I was required to remain on duty and perform work during rest breaks. In addition, I was not paid rest period premiums in lieu of receiving off-duty breaks.

4. As a result of being required to work through rest breaks, the wage statements I received did not display the correct number of hours worked, applicable hourly rates of pay, and gross and net wages earned.

5. To date, I have yet to receive the unpaid rest period premiums owed.

6. Throughout this litigation, I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining Defendant's practices. I have conferred with my attorneys to discuss this case and the facts involved, and also to respond to questions and provide documents. During the course of this litigation, I have made myself available to answer questions my lawyers may have and review documents as necessary.

7. I understand that this action was brought on behalf of all other employees in the State of California, and that I am acting as one of the representatives for the Class. As the Class Representative, I understand that it is my responsibility to act in the best interests of the Class and not my own. I agree that I will not put my own interests ahead of that of the Class, and that I will not settle out my class claims in this lawsuit separately or independently from the Class. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

8. I have and continue to be willing to assist in the investigation of this matter,

1 including meeting, conferring, discussing the case with my attorneys, gathering and providing
2 any necessary information and documents, making myself available for trial or any further
3 proceedings in this matter as required to represent the interests of the Class. I also understand my
4 duties and responsibilities to the proposed Class and will carry out those duties as necessary.
5 Thus far I estimate that I have spent approximately 30-40 hours on this matter, which includes
6 discussing this case and the facts involved with my attorneys and participating in meetings with
7 my attorneys; searching for and providing documents pertaining to the case; reviewing the files
8 and pleadings, including my employment records, the PAGA letter, complaints, and Settlement
9 Agreement; responding to any questions from my attorneys regarding Defendant's practices;
10 regularly providing information to my attorneys; and being available during mediation.

11 9. I have discussed the terms of the Settlement Agreement with my attorneys, and
12 based on the information provided, I believe the Settlement to be fair, adequate, and reasonable
13 for myself and for the entire Class.

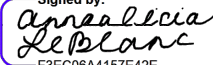
14 10. I am proud of the result and accomplishment of this lawsuit. I feel that it is a
15 positive accomplishment of this lawsuit. I understand that many individuals will benefit in this
16 lawsuit because of the actions that I have taken.

17 11. I am aware and have been aware from the start of the case, that there is the risk
18 that if I do not win my case, then I could be liable for Defendant's litigation costs. I accepted that
19 risk in this case.

20 12. I understand that this lawsuit is a public record. Further, because this lawsuit is a
21 public record, it could and can adversely affect my ability to obtain employment.

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

24 Executed on this 8 day of April 2026, at Galt, California.

25 Signed by:

26 F3EC06A4157E42E...
Annaalicia LeBlanc