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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

BRIANNA TAYLOR, LUIS GARCIA and CESAR VELEZ CERNA, individuals, and on behalf of all others similarly situated aggrieved,

Plaintiffs,

v.

SODEXOMAGIC, LLC, a Delaware Limited Liability Company; SDH SERVICES WEST, LLC, a Delaware Limited Liability Company; ASIS IQUECAL, an individual; and DOES 1 through 100, inclusive,

Defendants.

CASE NO.: 24STCV23503

Related Cases: 24STCV34737 and 24STCV00321

[Assigned for all purposes to the Hon. Elihu M. Berle in Dept. 6]

DECLARATION OF PLAINTIFF BRIANNA TAYLOR IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT

Action Filed: September 11, 2024
Trial Date: None Set

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and aggrieved

DECLARATION OF BRIANNA TAYLOR

1. I am a party to this action and reside in the State of California. I am fully competent to make this declaration. I have personal knowledge of the facts set forth herein, except for those stated on information and belief, and as to those I am informed and believe them to be true. If called upon to testify, I could and would testify as set forth herein.

2. I make this Declaration in support of Plaintiffs' Motion for Preliminary Approval of Class and Representative Action Settlement.

3. I was employed by defendants SodexoMagic, LLC, and SDH Services West, LLC ("collectively, "Defendants"), as a non-exempt employee, specifically as an Environmental Service Attendant, with duties that included, but were not limited to, cleaning and taking out trash, at USC Verdugo Hills Hospitals in California from approximately May of 2024 through approximately July of 2024.

4. I am informed and believe that, throughout my employment with Defendants, myself and other non-exempt employees of Defendants were not paid all wages owed because we were not paid for all time under Defendant's control, or for which we were suffered or permitted to work by Defendants. In addition, I am informed and believe we were not paid all overtime hours worked at the overtime rate of pay owed due to, without limitation, failure to record all time worked and failure to pay for off-the-clock work.

5. During my employment with Defendants, I often took meal periods that were after the fifth hour, short, or not duty-free. I witnessed other non-exempt employees with my job duties often taking meal periods that were after the fifth hour, short, or not duty-free, as well.

6. I do not recall receiving any premium pay for the full, timely and uninterrupted meal periods I was not provided an opportunity to take and am informed and believe that my coworkers were not provided premium pay for not being provided with the opportunity to take full, timely and uninterrupted meal periods either.

7. I do not believe I was provided with opportunities to take full, uninterrupted 10-minute rest periods while working with Defendants and am informed and believe my coworkers were often not provided with such an opportunity, either.

8. I do not recall receiving any premium pay for the full rest breaks I was not provided an opportunity to take and am informed and believe that my coworkers were not provided premium pay for not being provided with the opportunity to take full, uninterrupted 10-minute rest periods, either.

9. I do not recall that I was reimbursed for my work-related expenses, such as work-related use of personal cellphone, and am informed and believe my coworkers were often not provided with reimbursements for their work-related expenses, either.

10. Before and during the course of litigation, I was actively involved in assisting my attorneys to support the wage and hour claims asserted. My involvement began before the initial complaint was filed wherein, I provided first-hand knowledge and documentation as to Defendants' practices, their ownership and corporate structure, and their wage and hour policies and practices.

11. Part of the information I relayed was with regard to Defendants' timekeeping policies and practices, and their meal and rest period policies and practices.

12. I provided them with all the documentation provided to me by Defendants during my employment.

13. I assisted in reviewing time and payroll records with my attorneys, and informed them of Defendants' employment policies, and whether those policies matched Defendants' practices.

14. My attorneys called me to ask me questions over several times throughout the litigation and I contacted my attorneys several times to stay updated on the case and offer my assistance on any matters I could be helpful with. I was also available for mediation by telephone, during which I was available to be called to answer the questions posed by the mediator regarding the asserted claims, as well as arguments raised by Defendants. In addition, I worked with my attorneys over the next several weeks after mediation to understand and execute a long form settlement agreement.

15. Over the past several months since the case has been resolved, I have stayed in touch with my attorneys to ensure that there was no undue delay in payment for other class

members for whom I brought this Action.

16. I believe that, through the present, I have spent at least 25 hours in connection with this matter, which included time spent having preliminary calls with my attorneys; doing an intake with my attorneys; time spent searching for documents relating to my employment; time spent responding to informal discovery; time spent reading and understanding the Settlement Agreement; time spent answering calls to discuss Defendants' timekeeping, pay, meal and rest periods, and to review time and payroll records; time spent discussing with my attorneys Defendants' policies and practices; time spent on-call at mediation; and time spent checking in on the status of the case, among other things. I also spent time preparing this declaration to support Plaintiffs' Motion for Preliminary Approval of Class and Representative Action Settlement.

17. I feel that by bringing this lawsuit, I could stand up for not only my rights but the rights of other employees who suffered from the same unfair wage practices. I felt that current employees might not want to share their experiences with Defendants since they feared losing their jobs. This is certainly understandable as I, too, have to provide for myself and others.

18. By bringing this lawsuit, I have put the interests of the class ahead of my own.

19. I understood that I could possibly earn a small enhancement if this case is resolved favorably. I also knew that I could face retaliation from Defendants and backlash from former coworkers who are loyal to Defendants.

20. I also had to provide a general release of claims and a waiver of rights under California Civil Code section 1542 to Defendants as part of the settlement.

21. I understand that if I had brought this case individually, I may have earned more compensation individually and on a much quicker timeline than the timeline it took to resolve this Action.

22. I understood the substantial risks involved in serving as the Class Representative and undertook these risks knowing there was no certainty regarding the outcome of the case.

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23. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class, and, even more importantly, to put an end to what I believe are illegal practices on the part of Defendants. I believe I have achieved both through this lawsuit and settlement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct this 11/03/2026, at Los Angeles.

Brianna Taylor

BRIANNA TAYLOR