JUSTICE FOR WORKERS, P.C.
William C. Sung SB# 280792
E-Mail: william@justiceforworkers.com
Tiffany L. Luu SB# 335127
E-Mail: tluu@justiceforworkers.com
Joseph C. Ramli SB# 339491
E-Mail: jramli@justiceforworkers.com
3600 Wilshire Boulevard, Suite 1815
Los Angeles, CA 90010
Tel: 323-922-2000
Fax: 323-922-2000

Attorneys for Plaintiffs EDUARDO JOSE PAIZ and SHOGHIG PILILIAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

EDUARDO JOSE PAIZ and SHOGHIG PILILIAN, individuals and on behalf of all others similarly situated;

Plaintiffs,

vs.

EMANATE HEALTH, a California non-profit corporation; and DOES 1 through 50,

Defendants.

Case No.: 24STCV21209

[Assigned for All Purposes to:
Hon. Hon. Laura A. Seigle, Dept. 17]

DECLARATION OF SHOGHIG PILILIAN IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

(Filed concurrently with Motion for Final Approval; Supporting Declarations; and [Proposed] Judgment and Order)

DATE: October 30, 2026
TIME: 9:00 a.m.
DEPT: 17

Action Filed: August 20, 2024
Trial Date: Not Set

I, Shoghig Pililian, hereby declare as follows:

1. I am an individual over the age of 18 year and the named Plaintiff in the above-captioned matter. This declaration is submitted in support of approval of the proposed class action and PAGA settlement ("Settlement") reached in this case. I have personal knowledge of the facts contained in this declaration, and if called as a witness, could and would testify as to their accuracy.

2. I was employed by Defendant Emanate Health ("Defendant") as a non-exempt, hourly paid employee from approximately 2006 to approximately October 9, 2024 as a nurse supervisor at the Foothill Presbyterian Hospital in Glendora, California. During my employment with Defendant, I was subject to Defendant's wage and hour policies and practices that are at issue in this case.

3. Specifically, I was a night nurse supervisor. My colleagues in the same position and I had no way of taking meal and rest period during our shifts. For instance, we were responsible for holding keys to all of the patient rooms and can't just pass them to other staff members. We complained about not being relieved for our meal and rest periods and our managers simply responded that we must have 30 minutes and 10 minutes throughout our shifts to take those breaks. As a result, we had to work through our meal and rest breaks. Additionally, we worked off the clock because we must clock out by around 7:30 a.m. and stay behind 10 to 20 minutes after to clean up and give reports to the relieving supervisors. Additionally, I received various non-discretionary incentive compensation, which I believe were not properly factored into the regular rate pay. As a result of the foregoing issues, I believe I received inaccurate wage statements and was not paid all wages when my employment with Defendant ended. I believe other non-exempt employees of Defendant were subject to the same policies and procedures discussed above and that my claims against Defendant for unpaid wages and statutory and civil penalties are typical of Class Members' claims.

4. I retained Justice for Workers, P.C. ("JFW") in November 2024 and joined this then-pending class action and PAGA lawsuit as a co-Plaintiff and proposed Class Representative because I felt passionate about the wage and hour issues I experienced at work. I wanted to do the right thing and help my coworkers who have experienced similar wage and hour issues. Upon my separation of

employment, Defendant offered me a severance of $14,805 to release all of my claims and expressly give up my right to participate in this lawsuit. I declined the severance offer so I can participate in this lawsuit, even though my recovery in this case could be less than the severance.

5. Without waiving the attorney-client privilege, my attorneys explained my role and responsibilities as a Class Representative, and I understand my responsibilities as a Class Representative. Since retaining my attorneys, I have had many discussions and meetings with the attorneys and staff at JFW, discussions regarding Defendant's wage and hour practices and my claims in this case, litigation strategy, updates on how the case was proceeding, the Settlement, and how I could help the case and potential Class Members. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant documents with my attorneys. I also understand that as part of the Settlement, I have agreed to a general release of claims against Defendant, which is broader than the release of claims agreed to by other Class Members.

6. Furthermore, there is no conflict between my interests and the interests of the class that I am seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that I was injured by the same company-wide policies and practices to which the proposed Class was subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the proposed settlement to assure that it is fair.

7. I understood that at the time I filed this action, as a Class Representative, I owed a duty to the putative class members to faithfully prosecute this action with their best interests at the forefront of every decision. I understood that I could not make any decision in this action for the sole benefit of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice my personal best interests for the benefit of the interests of the putative class members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour practices. I believe that I faithfully executed the duties of a Class Representative throughout this litigation and will continue to do until this litigation is fully and finally resolved.

/ / /

8. I understand that my attorneys will request that the Court approve a service award of $15,000.00 for my efforts on behalf of the Class. I believe this amount is reasonable based on the amount of time and effort I have devoted to this case, the risks I have undertaken as a Class Representative, my general release of claims, and my declining Defendant's severance offer, as described above. My support for the Settlement is not contingent on my receiving this service award.

9. I do not have any conflict of interest with the proposed Administrator.

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

Executed on January 19, 2026 at Glendora, California.

Shoghig Pililian