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

CINZIA ROMERO, individually, and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

CTSH BURBANK, LLC, a California limited
liability company; CARE TO STAY HOME,
INC., an unknown business entity; CTSH, LLC, a
California limited liability company; CTSH
SOUTH BAY, LLC, a California limited liability
company; CTSH OC, LLC, a California limited
liability company; KRAIG M. NAKANO, an
individual; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 24NNCV05088

Honorable Ian C. Fusselman
Department T

**DECLARATION OF CINZIA ROMERO IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LABOR CODE § 2698,
ET SEQ.) SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION COSTS**

Reservation ID: 432127610166
Date: December 11, 2025
Time: 8:30 A.M.
Department: T

Complaint Filed: October 15, 2024
FAC Filed: October 28, 2025
Trial Date: None Set

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1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

3. I have spent many hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, providing information regarding the duties of aggrieved employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

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1 practices, and procedures of Defendants.

2 5. As far as the settlement is concerned, I was available to review documents and answer
3 any questions my attorneys had. I spent several hours reviewing the settlement agreement and asking
4 questions and discussing the potential settlement with my attorneys before signing the settlement
5 agreement.

6 6. I believe that I have done everything that is expected of a PAGA representative and also
7 everything my attorneys have asked of me. I have tried, to the best of my ability, to seek relief for the
8 aggrieved employees and the State of California. I think my efforts helped to get the result obtained in
9 this case.

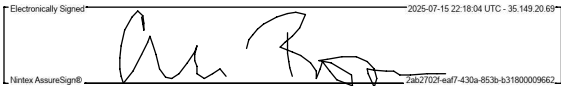
10 7. For my broader individual waiver and release of claims with a California Civil Code
11 Section 1542 waiver (set forth in Section 8(b) of the Private Attorneys General Act Settlement
12 Agreement and Release ("Settlement Agreement"), the Settlement provides for a General Release Fee
13 in the amount of \$15,000.00, to be paid out of the Total Settlement Amount, subject to Court approval.
14 I respectfully request that the Court award me full payment of the General Release Fee.

15 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

16 9. I have not entered into any undisclosed agreements, nor have I received any undisclosed
17 compensation in this case. The only compensation I will receive is whatever amount the Court awards
18 for the General Release Fee, as well as my share of the settlement as an aggrieved employee.

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

21
22 Executed this¹⁵ day of July 2025, at Pasadena, California.

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24 The image shows an electronic signature of Cinzia Romero. The signature is written in black ink on a white background. Above the signature, there is a small rectangular box containing the text "Electronically Signed" and a timestamp "2025-07-15 22:18:04 UTC - 35,149 20.69". Below the signature, there is another small rectangular box containing the text "Nintex AssureSign®" and a long alphanumeric string "2a22702f-ea7f-430a-853b-b31800009667".

25 Cinzia Romero