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

11 PHELLIPPE CARRILLO, an individual, on
12 behalf of himself and all other aggrieved
13 employees; et al.,

14 Plaintiffs,

15 vs.

16 LONGWOOD MANAGEMENT CORP., a
17 California corporation; et al.,

18 Defendants.
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CASE NO.: 20STCV44876

[Assigned for all purposes to the Honorable
Colin P. Leis, Dept. 74]

**DECLARATION OF JOSHUA RUBIO
FLORES IN SUPPORT OF JOINT
STIPULATION RE: PAGA
SETTLEMENT**

Complaint Filed:	November 20, 2020
FAC Filed:	November 30, 2020
SAC Filed:	December 6, 2021
TAC Filed:	October 18, 2024
Trial Date:	June 8, 2026

1 participated fully in this lawsuit.

2 8. From the time I became a PAGA representative in this litigation, I took an active
3 role in participating in decisions concerning the case, including settlement. I maintained regular
4 contact with my attorneys, via phone and in person, to give them additional information and to
5 keep myself informed of the developments in the case. I made sure that I understood everything
6 that was going on in the case so I could make the best informed decisions on behalf of the state
7 and other aggrieved employees.

8 9. As part of the settlement, I am releasing my individual wage and hour claims
9 against Defendants and waiving my rights under Civil Code § 1542 as to any and all claims
10 against Defendants.

11 10. Based on my information and belief, over 8,000 employees will be able to recover
12 penalties for the alleged wage and hour violations. Because I put myself on the line, each
13 aggrieved employee did not have to expend his or her own time and resources to pursue legal
14 remedies individually. This action would not have been possible without my active participation
15 and my willingness to place myself at risk for the sake of the other aggrieved employees.

16 11. I know that without my efforts, this lawsuit would not have been brought on behalf
17 of the aggrieved employees of Defendants and aggrieved employees would not have received
18 payment for civil penalties. Throughout the entire litigation, I did the best that I could to represent
19 the state and other aggrieved employees and to look out for their interests.

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct. Executed on 10/31/2025, 2025 at Hacienda heights,
22 California.

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24 Joshua Flores (Oct 31, 2025 17:18:07 PDT)

25 JOSHUA RUBIO FLORES
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