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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES
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12 PHELLIPPE CARRILLO, an individual, on
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 CLARIE
TUPUOLA 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

DECLARATION OF CLARIE TUPUOLA

I, Clarie Tupuola, hereby declare as follows:

1. I am a named plaintiff in the above-entitled action, *Carrillo, et al. v. Longwood Management Corp, et. al.*, Los Angeles County Superior Court, Case No. 20STCV44876. I make this declaration on the basis of personal firsthand knowledge, except as to those matters stated on information and belief. If called as a witness, I could and would readily and competently testify to all matters stated within.

2. I make this declaration in support of the parties' Joint Stipulation Re: PAGA Settlement.

3. I was directly employed by Defendant ADF Investments LLC dba Huntington Retirement Hotel as a Caregiver from approximately June 2019 to approximately July 2020.

4. I brought this action under the California Labor Code Private Attorneys General Act of 2004 ("PAGA") and have acted as a representative of the state and on behalf of other non-exempt aggrieved employees of Defendants.

5. I have spent approximately 45 hours on this case, including, but not limited to: in-person and telephonic meetings with my attorneys, searching for and producing relevant documents, preparing for and responding to questions from my attorneys in preparation for mediation, responding to written discovery, and reviewing the settlement agreement with my attorneys to ensure that its terms are fair and achieve PAGA's objectives.

6. I fully realized the risks I would be taking by pursuing this action as a PAGA representative. I knew that my future employer might conduct a background check on me or otherwise find out about my participation in the lawsuit against a previous employer and might retaliate against me as a result. I also knew that, as a PAGA representative, I would be bearing risks that other aggrieved employees would not be facing.

7. I also knew that I placed myself at a substantial risk because if Defendants were to prevail in this action, I could have been liable for Defendants' litigation costs. Yet I felt so strongly about standing up for the rights of Defendants' employees that I initiated and participated fully in this lawsuit.

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

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

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

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

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct. Executed on 11-5-25, 2025 at 8:40pm,
21 California.

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23  (Nov 5, 2025 20:40:58 PST)

24 CLARIE TUPUOLA
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