

Kristen M. Agnew (State Bar No. 247656)
Kwanporn “Mai” Tulyathan (State Bar No. 316704)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
kagnew@diversitylaw.com
ktulyathan@diversitylaw.com

Elwina Grigoryan, Esq. (SBN 316578)
KACE LAW, APC
500 N. Brand Blvd. Suite 2000
Glendale, CA 91203
747-758-9229
Facsimile: 747-758-9192
eg@kacelaw.com

Nick Galadzhyan, Esq. (SBN 324974)
CALIFORNIA JUSTICE LAWYERS, LLP
500 N. Brand Blvd. Suite 2000
Glendale, CA 91203
818-875-8585
Facsimile: 818-875-8585
Nick@CAJusticeLawyers.com

Attorneys for Plaintiff, the Class, and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA

SARAH ROBERTS-COOPER, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

RISE LUXURY REHAB, LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 2024CUOE033989

[Assigned to the Hon. Charmaine H. Buehner,
Dept. 44]

**DECLARATION OF SARAH ROBERTS-
COOPER IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: July 29, 2026

Time: 1:30 p.m.

Dept.: 44

Action Filed: December 4, 2024

Trial Date: None Set

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I, Sarah Roberts-Cooper, declare as follows:

1. I am an individual over the age of 18. I have personal knowledge of the facts set
below and if called to testify I could and would do so competently.

2. I was employed by Defendants Rise Luxury Rehab, LLC and Ascensions Treatment LLC (together, “Defendants”) as an Assistant/Scheduler from about April 2022, to July 2, 2022. Throughout my employment, I worked as a non-exempt, hourly employee.

3. During my employment, I contend that I was regularly required to perform work and already clocked out at the end of my shift. I further contend that Defendants did not pay the time I spent working off-the-clock.

4. I also contend that, throughout my employment, I did not consistently receive off-duty meal and rest breaks. My meal and rest breaks were often provided late, interrupted, or not provided at all. In addition, regardless of whether I actually received a proper meal and rest break, I contend that Defendants deducted thirty minutes from my time records. As a result, I am owed premium pay for missed, late, interrupted, or non-compliant meal and rest breaks.

5. As part of my work duties, I was also required to use my personal cell phone for related purposes, including communicating with co-workers, scheduling work-related matters, and responding to work-related calls and messages. I contend that Defendants did not reimburse me for the costs associated with using my personal cell phone for work-related purposes.

6. As a result of the violations above, I contend that I did not receive accurate wage
payments from Defendants.

7. I filed this lawsuit with no guarantee of personal benefit. I brought this case because I was concerned that Defendants were not treating its employees fairly by failing to pay all wages owed, failing to provide proper breaks, and reimbursing employees for work-related expenses. I brought this case, in part, because I thought that, by coming forward, I could help bring about changes to Defendants' policies and better the working conditions of employees, including my former co-workers.

8. However, I did not make the decision to file this lawsuit lightly. I was concerned that bringing a publicly filed lawsuit against Defendants could affect my reputation and future employment opportunities if prospective employers learned of it. Nevertheless, I believed it was important to pursue this case because the issues raised in it affected not only me, but other employees as well.

9. Additionally, I am aware, and have been aware from the beginning of the case, that if I did not prevail, there was a risk I could be responsible for some or all of Defendants' litigation costs. If I had lost the case and been ordered to pay Defendants' litigation costs, it would have been financially devastating to me.

10. When I stepped up to serve as the named plaintiff, I understood that I would be representing other hourly employees (except therapists and practitioners) who worked for Defendants in addition to myself. I believe that my interests have been, and continue to be, aligned with the hourly employees I represent in this lawsuit. I do not have any interests that are adverse to the interests of my former co-workers.

11. I also understood that I was expected to represent the interests of other employees and to take that responsibility seriously. Because of that responsibility, I made it a priority to remain actively involved in the case, I estimate I have spent approximately 40 hours in connection with this action, including time spent:

- a. Meeting with my attorneys and discussing this case and the facts involved on numerous occasions;
- b. Searching for and gathering documents related to this case, including my employment records and paystubs, any policy documents, and related communications on my emails and phone;
- c. Reviewing the pleadings and other documents, including my PAGA letters, the complaints, my declaration and the settlement agreement;
- d. Regularly providing information to my attorneys and responding to any questions; and

1 e. Participating in a full-day of mediation.

2 12. My attorneys have explained the general terms of the Joint Stipulation of Class and
3 PAGA Representative Action Settlement (“Settlement Agreement” or “Agreement”) to me,
4 including the relief that will be provided to Class Members and Aggrieved Employees, the risks of
5 continued litigation, and the uncertainty of further proceedings. Based on that information, my
6 experience in the case, and my discussions with my attorneys, I believe the settlement is fair,
7 adequate, and reasonable.

8 13. The Settlement Agreement provides for a requested Class Representative
9 Enhancement Payment in the amount of \$5,000.00 to me, subject to Court approval. I believe this
10 amount is fair and reasonable given the risks I took, the tasks I performed, the time I invested, and
11 the benefit that the State and Defendants’ employees will receive from this action. I respectfully
12 request that the Court approve the full amount of the Class Representative Enhancement Payment

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

15 Executed on this 30 of June 2026, at New Braunfels, California.

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Sent for signature to Sarah Roberts
(info.sarahroberts@gmail.com) by services@clio.com acting on
behalf of alice@cajusticelawyers.com
IP: 99.117.163.224



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IP: 146.75.164.253



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