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Attorneys for Plaintiff NORMA BORQUEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF YOLO

NORMA BORQUEZ, an individual and on behalf of all others similarly situated;

Plaintiff,

vs.

LANDMARK PROPERTIES, INC.; and DOES 1 through 50,

Defendants.

Case No.: CV2024-2480

[Assigned for All Purposes to:
Hon. Samuel T. McAdam, Dept. 14]

DECLARATION OF NORMA BORQUEZ IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

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

DATE: To Be Assigned
TIME: To Be Assigned
DEPT: 14

Action Filed: September 24, 2024
Trial Date: Not Set

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I, Norma Borquez, 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 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 Sutherland Healthcare Solutions Inc. ("Defendant") as an hourly-paid, non-exempt employee from approximately May 14, 2024 to August 30, 2024 as a housekeeper at Sol at West Village in Davis, 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 received non-discretionary incentives which I believe were not properly factored into the regular rate pay, I sometimes could not take compliant meal breaks because I was too busy, I sometimes could not take compliant rest breaks because of my job duties, and I had to use my personal cellphone for work without reimbursement. 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 have been actively involved in this case since I first retained Justice for Workers, P.C. ("JFW") in September 2024. Without waiving the attorney-client privilege, prior to filing this lawsuit, 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 estimate that I have spent at least 20 hours on this case from the time I first spoke with my attorneys regarding this case until the present. I also understand that as part of the Settlement, I have agreed to a general release of claims against Defendant, which is

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broader than the release of claims agreed to by other Class Members.

5. 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.

6. 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.

7. I understand that my attorneys will request that the Court approve a service award of $10,000.00 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 including being sued by Defendant, and my general release of claims, as described above. My support for the Settlement is not contingent on my receiving this service award.

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

Executed on April 30, 2026 at Woodland, California.

Norma Borquez

Norma Borquez

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