

John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
Emily Borman (SBN 303180)
emily.borman@wilshirelawfirm.com
Diego Aviles (SBN 315533)
diego.aviles@wilshirelawfirm.com
Harry Erganyan (SBN 333091)
harry.erganyan@wilshirelawfirm.com
Mariam Nazaretyan (SBN 334154)
mariam.nazaretyan@wilshirelawfirm.com
Lisa B. Iturriaga (SBN 339678)
lisa.iturriaga@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa St., Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff Yvonne Robles, individually, and
on behalf of all others similarly situated

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

YVONNE ROBLES, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

COMMUNITY CONVALESCENT
CENTER OF MONTCLAIR, INC., a
California corporation; and DOES 1 through
10, inclusive,

Defendants.

Case No. 24STCV27945
Related Case No. 25STCV00224

*Assigned for All Purposes To:
Hon. David S. Cunningham III, Dept. 11*

**DECLARATION OF YVONNE ROBLES IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

I, Yvonne Robles, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Community Convalescent Center of Montclair, Inc. (“CCCM” or “Defendant”) as an hourly-paid, non-exempt housekeeper from around October 2022 to approximately September 2024. My job duties included, without limitation, tending to patient rooms and common areas, sweeping and mopping, taking out trash, cleaning bathrooms, and assisting with basic patient care and providing customer service.

3. Based on my experience and knowledge of Defendant’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of Defendant.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of Defendant. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees at Defendant.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Defendant’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Defendant.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

7. Further, when I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendant and as a private attorney general for

1 the State of California, I understood that I was not only seeking unpaid wages and penalties on
2 behalf of myself, but also for other employees who worked for Defendant, and that by doing so,
3 I would be delaying more immediate recovery available to me through the Labor
4 Commissioner's office.

5 8. I was also made aware that being a class representative and private attorney
6 general in an action filed on behalf of others would subject me to a stigma that is sometimes
7 associated with those who bring these kinds of lawsuits. I was aware that, as a class
8 representative and private attorney general, I might be responsible for some or all of
9 Defendant's legal costs if the case was not successfully concluded. Even with knowledge of
10 these risks, I was willing to go forward and to act on behalf of the other employees and the State
11 of California, but I was nervous about losing and having a judgment filed against me for costs
12 or losing job opportunities in the future.

13 9. I understood that there were risks involved in class and representative action
14 lawsuits. I understood that the lawsuit could continue for several years and require my services
15 and attention throughout the entire length of the lawsuit. I learned that even if we won at trial,
16 the case could be further delayed by appeals.

17 **Notoriety and Personal Difficulties Encountered**

18 10. As the named plaintiff, I am the face of the litigation. As of the date of this
19 declaration, the class notice will be mailed in this case to 764 current and former employees of
20 Defendant, which will inform them that I filed a class and representative action against
21 Defendant. Exposing myself to this kind of publicity creates a risk for my future career
22 prospects, since current and former employees of Defendant may move to different companies
23 within the industry or may know people at other companies within the industry who may not
24 wish to hire someone who sued her employer. I also understand that having filed this lawsuit in
25 court means that there is now a permanent public record of this lawsuit available to the general
26 public. Given this additional exposure, there is further risk to my future career prospects.

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Amount of Time and Effort Spent and Duration of the Litigation

11. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and information to my attorneys, keeping in regular contact with my attorneys regarding the status of the case, and reviewing the settlement agreement to make sure it was fair.

Personal Benefit Received as a Result of the Litigation

12. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, who are only releasing the wage and hour claims asserted in the lawsuit, I have signed a general release of claims as to Defendant.

13. I will continue to actively participate in this lawsuit as necessary, and will continue to make myself available to assist in this case moving forward as needed.

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

Executed on September 29, 2025 at Covina, California.

Signed by:



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Yvonne Robles