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Attorneys for Plaintiff Yvonne Robles

**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*

**SUPPLEMENTAL DECLARATION OF
JOHN G. YSLAS IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

PRELIMINARY APPROVAL HEARING

Date: April 1, 2026
Time: 9:00 a.m.
Dept.: 11

1 I, John G. Yslas, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all of the courts of the State of
3 California. I am a senior partner at Wilshire Law Firm, PLC (“WLF”), counsel for Plaintiff Yvonne
4 Robles (“Plaintiff”) in this matter. I am thoroughly familiar with and have personal knowledge of
5 all of the facts set forth herein.

6 2. I submit this declaration in support of Plaintiff’s Motion for Preliminary Approval
7 of Class Action and PAGA Settlement.

8 3. On September 30, 2025, Plaintiff submitted a copy of the Settlement Agreement to
9 the LWDA. A true and correct copy of the confirmation of submission my office received after
10 submitting the Settlement Agreement to the LWDA is attached hereto as **Exhibit 2**.

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

13 Executed on October 1, 2025 at Los Angeles, California.

14
15 
16 John G. Yslas

EXHIBIT 2

EXHIBIT 2

IMPORTANT NOTICE OF REDACTION RESPONSIBILITY: All filers must redact: Social Security or taxpayer identification numbers; personal addresses, personal telephone numbers, personal email addresses, dates of birth; names of minor children; & financial account numbers. This requirement applies to all documents, including attachments.



Private Attorneys General Act (PAGA) – Filing

Proposed Settlement of PAGA case

PAGA Number (LWDA-CM-) : *

Please enter only the numbers after "LWDA-CM-" in the following format, "XXXXXXXX-XX".

[Search for PAGA Case number](#)

The timing of the deposit of settlement checks is governed by the provisions of the State Administrative Manual. This ministerial, administrative act of depositing a settlement check mandated by state procedures should not be construed as nor does it constitute an unconditional, voluntary and/or absolute acceptance of settlement proceeds or approval of the terms of any settlement agreement or judgment related to that check.

Your Information (Person Who is Filing)

Your First Name *

John

Your Last Name *

Yslas

Your Email Address *

theresa.chan@wilshirelawf

Your Street Name, Number and Suite/Apt *

660 S. Figueroa Street, Sk

Your Mobile Phone Number

Your City *

Los Angeles

Your Work Phone Number

213-381-9988

Your State *

California

Your Zip/Postal Code *

90017

Court and Hearing Information

Court *

Los Angeles County Superior Court ▼

Court Case Number *

24STCV27945

Hearing Date *

04/01/2026

Hearing Time *

09:30

HH:MM

Hearing Location *

312 North Spring Street, L

Number of aggrieved employees *

764

Net Amount to Aggrieved Employees *

35000.00

Gross settlement amount *

900000.00

Gross penalty *

100000.00

Penalties to LWDA *

65000.00

Date of proposed settlement *

09/25/2025

Other PAGA Notices

[Search for PAGA Case number](#)

- ☒ I have searched LWDA's database for other PAGA claims filed against the employer(s) named in my NEW PAGA Claim Notice.
- ☒ There are no other PAGA claims which may be affected by this proposed settlement.
- ☐ The proposed settlement may affect other PAGA claims.
- ☐ A Notice of Related Cases has been filed in all related actions.
- ☐ Plaintiff has provided copies of proposed settlement and moving papers to plaintiffs with claims that are affected by this proposed settlement agreement.
- ☐ Plaintiff has submitted to LWDA the court complaint(s) on which this settlement is based.

Proposed Settlement and Other Documents

Proposed Settlement (must be .pdf) *

 CCCM Amend...lly Exec'd.pdf

Other Attachment (if any, must be .pdf)

 No file chosen[Add Another Attachment](#)

LWDA requests that settling parties provide copies of supporting documents, including memorandum of points and authorities and declaration of counsel filed with the court, to assist LWDA in evaluating proposed settlement agreements.

IMPORTANT NOTICE OF REDACTION RESPONSIBILITY: All filers must redact: Social Security or taxpayer identification numbers; personal addresses, personal telephone numbers, personal email addresses, dates of birth; names of minor children; & financial account numbers. This requirement applies to all documents, including attachments.

☒ **I understand that, if I file, I must comply with the redaction rules consistent with this notice.**

Should you have questions regarding this online form, please contact PAGAInfo@dir.ca.gov

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Submit

Theresa Chan

From: no-reply@formassembly.com
Sent: Tuesday, September 30, 2025 11:48 AM
To: Theresa Chan
Subject: Thank you for your Proposed Settlement Submission

09/30/2025 11:48:11 AM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

On 09/30/2025 11:48:11 AM your Proposed Settlement was successfully processed for case number LWDA-CM-1059451-24

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website:

https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Flabor.ca.gov%2FPrivate_Attorneys_General_Act.htm&data=05%7C02%7Ctheresa.chan%40wilshirelawfirm.com%7C29c432d0acdd4635739c08de0051f065%7C9ada260a4f194da187b814d372333753%7C1%7C0%7C638948549114778604%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMlslkFOlJoiTWFpbCIldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=RpFP3WpkplfL16QaWK0YiklTkEpVUEUp1jA4G2CHRIc%3D&reserved=0