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Attorney for Plaintiff,
ELENA MARTHA VARELA, on behalf of herself and all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

ELENA MARTHA VARELA, on behalf of herself and all others similarly situated, and on behalf of the general public,

Plaintiff,

vs.

FLORENCE CRITTENTON SERVICES OF ORANGE COUNTY, INC., a California Corporation, and DOES 1 to 10, inclusive,

Defendants.

CASE NO.: 30-2025-01462276-CU-OE-CXC

DECLARATION OF PLAINTIFF ELENA MARTHA VARELA IN SUPPORT OF HER UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Date: July 16, 2026
Time: 2:00 p.m.
Dept.: CX105
Judge: Hon. Melissa R. McCormick
Reservation No.: 74836400

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I, Elena Martha Varela, declare as follows:

1. I am the named class representative in this case. I submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement. I make this statement of my own personal knowledge, and if called to testify, I could and would testify competently to the facts below.

2. I was employed by Florence Crittenton Services of Orange County, Inc. ("Defendant"), as an hourly-paid non-exempt employee.

3. During my time working for Defendant, I believe that I was not paid all wages, including all minimum and overtime wages owed to me. I also believe that I was denied uninterrupted meal and rest breaks, and was not reimbursed for using my personal cell phone for the benefit of Defendant.

4. During the time that I was employed at Defendant, I followed the same timekeeping, scheduling and payroll policies and practices as the other hourly employees I observed and interacted with.

5. At the beginning of this case, my attorneys made me aware of the general obligations of serving a class representative Plaintiff in this case. Because of the wage and hour violations that I experienced during my employment with Defendant, I agreed to serve as a class representative Plaintiff and pursue my case as a class and representative action on behalf of all similarly situated employees of Defendant and the State of California.

6. By deciding to serve as a Named Plaintiff in this case, I agreed to pursue not only my own wage and hour claims, but the claims of all similarly situated employees of Defendant, and, if necessary, to put the interest of all similarly situated employees ahead of my own. I have no interests that are antagonistic to my coworkers with respect to the claims alleged in this case. I pledged to actively participate in the lawsuit and to assume the risks of serving as a Named Plaintiff in a class action. My attorney also explained the risks associated with litigation, and that the case could take years to resolve, and therefore required a long-term commitment on my part. I also understood that I was potentially responsible for paying Defendant's attorney's fees and costs.

7. During this litigation, I have spent a significant amount of time working with my attorneys and participating in this lawsuit as follows:

a. I regularly conferenced with my attorneys, before and after the filing of the lawsuit, to discuss the status of the case, to offer my input on Defendant's practices and

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policies, to provide names of witnesses, to assist in gathering evidence and documents that supported the class claims, to review policy documents and payroll records from Defendant, and to discuss settlement options; and

b. I also spent significant time helping my attorneys prepare for mediation and answering questions about how Defendant's policies and practices impacted me and my coworkers. I made myself available during the entirety of the all-day mediation which took place on zoom, approved the tentative settlement, and reviewed and approved the final settlement agreement. I regularly spoke with my attorneys to make sure I was fully informed of the facts and settlement negotiations.

8. Overall, I estimate that I have devoted 45-50 hours of my time to this case. This was not an easy thing to do as I have my own job and responsibilities.

9. By agreeing to bring this class action, I accepted the responsibilities of representing the interests of all similarly situated employees and willingly chose to assume risks and potential costs associated with the case. I did, and still do, have a fear that future employers may not hire me should they find out that I served as a class representative Plaintiff in a wage and hour lawsuit. However, this is another risk I am willing to take in order to further the interests of the case.

10. I am aware that Defendant denies the allegations in this lawsuit and that there has been no determination that Defendant is actually liable for any of these alleged violations. I also understand that there are many risks and uncertainties involved in continuing to pursue this case. I have been advised of the terms of the proposed settlement of this case, and in light of the risks and uncertainties in proceeding with the case, I believe the proposed settlement is fair and reasonable and in the best interests of the class members.

11. I have requested a Service Award for my services as Named Plaintiff in the amount of $10,000.00. I believe that my request for this service award is fair and reasonable in light of the amount of work I put into this case to ensure a good result as well as the risks (as mentioned above) I took in serving as a Named Plaintiff.

I declare under penalty of perjury that the foregoing is true and correct under the laws of the State of California. Executed on 04 / 27 / 2026 in the City of Whittier, State of California.

Elena Martha Varela

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