

Raul Perez (SBN 174687)
Raul.Perez@capstonelawyers.com
Bevin Allen Pike (SBN 221936)
Bevin.Pike@capstonelawyers.com
Daniel Jonathan (SBN 262209)
Daniel.Jonathan@capstonelawyers.com
Trisha K. Monesi (SBN 303512)
Trisha.Monesi@capstonelawyers.com
CAPSTONE LAW APC
1875 Century Park East, Suite 1860
Los Angeles, California 90067
Telephone: (310) 556-4811
Facsimile: (310) 943-0396

Attorneys for Plaintiffs Juana Matias,
Carmen Chavez Fernandez, Yolanda Membreno de
Ayala, and Maria Rodriguez de Paz

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CRUZ

JUANA MATIAS, CARMEN CHAVEZ
FERNANDEZ, YOLANDA MEMBRENO DE
AYALA, MARIA RODRIGUEZ DE PAZ,
HANNAH KNOERZER, HERIBERTO
CHAVEZ RODRIGUEZ, GRACIELA
LOPEZ, individually, and on behalf of other
members of the general public similarly situated,
and as aggrieved employees pursuant to the
Private Attorneys General Act ("PAGA"),

Plaintiffs,

vs.

HOSPITALITY STAFFING SOLUTIONS,
LLC, a Delaware limited liability company;
KELLERMEYER BERGENSONS
SERVICES, LLC, a Delaware limited liability
company; and DOES 1 through 10, inclusive,

Defendants.

CASE NO.: 23CV00490

[Assigned for all purposes to Hon. Timothy Schmal
in Dept. 10]

**DECLARATION OF YOLANDA
MEMBRENO DE AYALA IN SUPPORT OF
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: May 5, 2026
Time: 8:30 a.m.
Place: Department 10

Complaint Filed: February 28, 2023
Trial Date: None Set

DECLARATION OF YOLANDA MEMBRENO DE AYALA

I, Yolanda Membreno de Ayala, hereby declare as follows:

1. I am over eighteen years old. Unless the context indicates otherwise, I have personal knowledge of the following facts, and if called as a witness, I could and would testify competently to them. I am a named plaintiff in the above-captioned action, and a representative for the Settlement Class. I make this declaration in support of the Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I was employed by Defendants Hospitality Staffing Solutions, LLC and Kellermeyer Bergensons Services, LLC (“Defendants”) as a housekeeper at their jobsite in Aptos, California from approximately June 2019 through August 2022. I decided to file a wage and hour action against Defendants because I had a number of grievances against them stemming from their labor policies. These grievances are set forth in detail in the operative Complaint and my letter to California Labor and Workforce Development Agency (“LWDA”)

3. Prior to filing the action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendant.¹ During those conferences, my attorneys provided me with an overview of how those claims would be litigated, and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

4. When I agreed to represent other non-exempt employees performing duties for Defendant in the State of California, I understood it was my duty to be readily available and to participate actively in this case. I knew that I would be required to review documents, search for documents and produce them to my attorneys, answer written questions, potentially answer oral questions and testify truthfully under oath, and be available to appear in court, if necessary. I understood that I needed to maintain awareness of the status and progress of the lawsuit.

5. After retaining my attorneys, I spent considerable time on the phone discussing the facts of my case with my attorneys. I discussed the facts related to my employment with Defendant, including

¹ Although the preservation of my attorney-client privilege requires that I refrain from revealing the specifics of my communications with my attorneys, I understand that the privilege is not waived by stating generally the matters that I have discussed with my attorneys.

discussing my job duties and responsibilities, my job position, the hours and days I worked, and how I was compensated.

6. My attorneys provided me with a draft of the Complaint for my review and approval. I closely reviewed the Complaint to ensure accuracy and completeness. Following the filing of the Complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly contacted my attorneys to stay current on the status of the litigation, and to discuss my attorneys' progress in prosecuting the claims.

7. I have worked to the best of my ability to prosecute this action on behalf of the entire class, always considering the interests of the class members just as I would consider my own interests. I believe class actions are an important tool to assure compliance with the law even where an individual's losses may be relatively small. I have no interests which are inconsistent with the interests of the class.

8. Since initiating this lawsuit until now, I have kept aware of the status of the lawsuit and provided my attorneys with information used by them in the litigation. I have spent large amounts of time and effort pursuing my claims and the claims of the other employees from the time I retained my attorneys to the present date.

9. I have carefully reviewed the terms of the proposed settlement. My attorneys explained the specifics of how the settlement would work and I accepted the settlement only after I had spent time evaluating the proposed outcome to assure that it was fair. Based on my attorneys' evaluation and recommendation, and my own review, I believe the settlement is fair and reasonable and adequately compensates Class Members.

10. In summary, over the course of this litigation I have spent a significant amount of time conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement and related documents. I estimate that I have spent between 25 and 35 hours assisting my attorneys in the prosecution of this lawsuit.

11. I am committed to this case and will continue to make myself available as needed in the settlement process.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed on [Date] 3/24/2026, at [City] María y ayala, California.

3 Firmado por:

4 

08571347695644E1

Yolanda Membreno de Ayala