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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

TANYA MARSHALL and MARIA
ANDRADE, individually, and on behalf of
other members of the general public similarly
situated,

Plaintiff,

v.

WATTS HEALTHCARE CORPORATION, a
California Corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 19STCV27737

Related Case No. 20STCV08186

**DECLARATION OF MARIA ANDRADE IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: February 26, 2025

Time: 10:30 a.m.

Judge: Hon. Stuart M. Rice

Dept.: 1

1 I, MARIA ANDRADE, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am one of the named Plaintiffs in the
4 above wage and hour class action filed against Defendant Watts Healthcare Corporation (hereinafter
5 “Defendant”).

6 2. This declaration is being submitted in support of Plaintiffs’ Motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. I believe that I am, have been and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
10 to represent.

11 4. I worked for Defendant as a non-exempt employee in California from approximately
12 September 2021 to approximately October 2021. At all times during my employment, I earned an
13 hourly wage and was entitled to legally compliant meal and rest periods, and minimum, regular and
14 overtime wages for all hours worked. Throughout my employment, I was subject to Defendant’s
15 policies and procedures.

16 5. Generally, my lawsuit claims that Defendant failed to pay for all time worked, failed to
17 provide complaint meal and rest periods, failed to reimburse for required business expenses, failed to
18 furnish accurate itemized wage statements, and failed to pay all wages when due.

19 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
20 to represent because I was subject to the same alleged unlawful employment policies and practices at
21 issue in this action, including but not limited to, Defendants’ failure to provide complaint meal and
22 rest periods, failure to reimburse for mandatory business expenses, failure to furnish accurate itemized
23 wage statements, failure to pay for all hours worked, and failure to pay all wages when due. Factually,
24 Defendant’s policies and practices apply class wide, and Defendant’s liability can be determined by
25 facts common to all members of the Class.

26 7. Further, there is no conflict between my interests and the interests of the class that I am
27 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
28 I was injured by the same company-wide policies and practices to which the proposed Class was

1 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
2 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the
3 proposed settlement to assure that it is fair.

4 8. I understood at the time that I filed this action, that as a Class Representative, I owed a
5 duty to the putative class members to faithfully prosecute this action with their best interests at the
6 forefront of every decision. I understood that I could not make any decision in this action for the sole
7 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
8 sacrifice my personal best interests for the benefit of the interests of the putative class members.
9 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
10 relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour
11 practices. I believe that I faithfully executed the duties of a Class Representative throughout this
12 litigation and will continue to do until this litigation is fully and finally resolved.

13 9. On December 8, 2021, mediation was held. Though the Parties did not reach a
14 settlement at the mediation, they ultimately reached a settlement in July 2024 with the assistance of
15 the mediator.

16 10. I have reviewed the terms of the Agreement in its entirety, including the monetary terms
17 and releases. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
18 and made in the best interest of the Participating Class Members. Consequently, I respectfully, and
19 humbly, I ask the Court to grant preliminary approval of the Settlement and all of its terms.

20
21 I declare under the penalty of perjury under the laws of the State of California that the foregoing
22 is true and correct. Executed 01/28/2025, at Compton, California.

23
24 By: 
25 MARIA ANDRADE
26
27
28