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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 TANYA MARSHALL 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, TANYA MARSHALL, 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 of the Class Members that I am
10 seeking to represent.

11 4. I worked for Defendant as a non-exempt employee in California from February 2017 to
12 approximately May 2017. At all times during my employment, I earned an hourly wage and was
13 entitled to legally compliant meal and rest periods, and minimum, regular and overtime wages for all
14 hours worked. Throughout my employment, I was subject to Defendant’s policies and procedures.

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

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

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

1 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the
2 proposed settlement to assure that it is fair.

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

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

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

19
20 I declare under the penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed 01/28/2025, at Long Beach, California.

22
23 By: 
24 Tanya Marshall (Jan 28, 2025 14:05 PST)
25 TANYA MARSHALL
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28