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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

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

Plaintiffs,

v.

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

Defendants.

Case No. 19STCV27737

**DECLARATION OF PLAINTIFF TANYA
MARSHALL'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT AND MOTION FOR
CLASS COUNSEL FEES, CLASS COUNSEL
LITIGATION EXPENSES, AND CLASS
REPRESENTATIVE SERVICE PAYMENTS**

Date: August 25, 2025
Time: 10:30 a.m.

Dept.: 1

1 I, TANYA MARSHALL, declare as follows:

2 1. I am over the age of eighteen, a California resident, one of the Plaintiffs and Proposed
3 Class Representatives in the above-entitled matter. I submit this declaration in support of Plaintiffs'
4 Motion for Final Approval of Class Action and PAGA Settlement and in support of Plaintiff's Motion
5 for Class Counsel Fees, Class Counsel Litigation Expenses, and Class Representative Service Payments.
6 I have personal knowledge of all the facts stated herein. I could and would competently testify under
7 oath to these facts in court if requested to do so.

8 2. I retained Class Counsel in July of 2019 and filed the lawsuit in August of 2019. I filed
9 the case on behalf of myself, Plaintiff Maria Andrade, and a class of persons defined as all persons who
10 are or previously were employed by Defendant Watts Healthcare Corporation ("Defendant") in
11 California and classified as non-exempt or hourly-paid employees at any time during the Class Period.

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

17 4. I filed the case because I believed my rights as an employee were violated by Defendant
18 and the rights of other employees that worked for Defendant. Among other claims, I believe Defendant
19 failed to pay for all time worked, failed to provide compliant meal and rest periods, failed to reimburse
20 for required business expenses, failed to furnish accurate itemized wage statements, and failed to pay all
21 wages when due.

22 5. Before I initiated the case as a plaintiff and Class Representative, I spoke at length with
23 my attorneys. We discussed my work experience and how company policies were applied to me and
24 other employees. I provided the attorneys with documents they requested. We reviewed the documents
25 together and asked and answered many questions regarding my experience working for Defendant, the
26 litigation process, and about class actions generally.

27 6. During these conversations, I learned about my responsibilities as a plaintiff in the lawsuit
28 and as proposed a Class Representative. I understood that pursuing this action as a class action rather

1 than merely seeking my individual claims substantially increased the risk to me. Those risks included
2 the possibility of being held liable for Defendant's attorneys' fees and costs in a complex class action if
3 I lost the case. I also understood that as a Class Representative, I would be under increased scrutiny by
4 the attorneys and the Court because I needed to prove that I was an adequate class representative.
5 Further, I understood that I would lose some autonomy over my individual claims that I could not make
6 decisions for my sole benefit and that I needed to make every litigation decision with the best interests
7 of the Settlement Class in mind.

8 7. I also understood that pursuing this litigation created a very public record of my grievances
9 with Defendant which produced the risk that a future employer could hold it against me that I sued a
10 former employer.

11 8. I also knew that I was making a sacrifice in that I could have pursued my claims only on
12 an individual basis, likely obtaining a recovery greater than the portion of the class settlement I stand to
13 receive from this settlement. My attorneys explained to me that the net settlement value of my individual
14 claims may be greater than my ultimate recovery from the net class settlement amount.

15 9. Notwithstanding these risks and sacrifices, I decided to go through with the case because
16 I believed violations occurred and most employees would not know what their rights are and even if
17 they did, they would be apprehensive to file a lawsuit against their employer for fear of retaliation.

18 10. During the lawsuit I communicated on a regular basis with my attorneys. I reviewed status
19 updates from my attorneys and court filings on a regular basis, and spoke to my attorneys on the phone,
20 because I wanted to keep up with developments in the case which I understood was one of my duties as
21 a class representative.

22 11. **Review and Approval of Settlement:** A mediation was held on December 9, 2021. Even
23 though I could not attend, I was available by telephone to speak with my attorneys and did speak with
24 them regarding the mediation before it took place. I also spoke with my attorneys after the mediation. I
25 again spoke with my attorneys when the Parties reached a settlement. I was very satisfied with the terms
26 of the settlement that was agreed to by the Parties. I reviewed and signed the Memorandum of
27 Understanding on July 26, 2024, and when the settlement papers were ready, I again spoke with my
28 attorneys and reviewed the settlement agreement which I signed on January 29, 2025.

12. **Participation:** Since I retained Class Counsel approximately six years ago, I have been actively involved with this class action lawsuit performing the duties described above. While I did not keep formal time records, I was in regular contact with my attorneys, reviewed important court filings with my attorneys, and spent considerable time on the issues presented during the litigation and in the settlement process. I estimate that I spent approximately 15-20 hours working on this case.

13. Also, my attorneys explained to me that the settlement process involved a two-step review by the Court to determine whether the settlement was fair before ordering that the settlement be funded and paid. I knew this process also involved notifying all class members of the settlement terms and of their rights to make a claim for their settlement share, to opt out of the settlement or to object to the settlement.

14. Ultimately, I believe I did the right thing in pursuing this case on behalf of the class who now stand to receive substantial monetary payments as a result of this case and settlement. I also believe that the requested Service Award in the amount of \$7,500 from the settlement is fair compensation for (1) the work I performed, (2) the sacrifices made not pursuing this case individually, and (3) the risks I undertook.

15. In light of all the time and effort I have spent on this case, the sacrifice I have made, the risks I undertook by suing a former employer, the exposure to being responsible for paying Defendant's costs in the event we did not win the case, and in light of the size of the settlement, I believe the request for \$7,500 as a service award is fair and reasonable.

16. Further, I support my attorneys' application for Attorneys' Fees and Litigation Costs in the amount of up to \$125,000, comprised of \$666,000 for attorneys' fees (one-third of the Gross Settlement Amount) and up to \$30,000 for reimbursement of actually incurred litigation expenses.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 07/29/2025 , at Long Beach, Ca (Location/City), California.

By: Tanya Marshall (Jul 29, 2025 10:21:29 PDT)
TANYA MARSHALL