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Superior Court of California,  
County of Tulare  
**02/08/2024**  
By: Vanessa Minguela,  
Deputy Clerk

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9 **SUPERIOR COURT OF CALIFORNIA**

10 **COUNTY OF TULARE**

11  
12 LUCI GILLESPIE and ILEANA  
13 SUASTEGUI, on behalf of themselves and all  
others similarly situated,

14 Plaintiffs,

15 v.

16  
17 PLUM HEALTHCARE GROUP, LLC, a  
California limited liability company; and  
18 DOES 1-100, inclusive,

19 Defendants.

Case No. VCU285376

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

Judge: Hon. Bret Hillman  
Dept.: 7

Complaint Filed: December 17, 2020  
Trial Date: None Set

1 **DECLARATION OF ESTHER CORONA**

2 I, Esther Corona, declare as follows:

- 3 1. I am a named plaintiff and seek to represent the putative Class in the above-captioned action  
4 (“Action”). I am over the age of 18. The following statements are based on my personal  
5 knowledge. If called upon to testify as to the matters stated herein, I could and would do so  
6 competently.
- 7
- 8 2. I submit this Declaration in Support of Plaintiffs’ Motion for Preliminary Approval of Class  
9 and PAGA Action Settlement in the Action against Defendants Plum Healthcare Group, LLC;  
10 Flax Holdings, LLC d/b/a River Valley Care Center; Gladiolus Holdings, LLC d/b/a The Pines  
11 at Placerville Healthcare Center; Jujube Holdings, LLC d/b/a Sunnyvale Post-Acute Center;  
12 Douglas Fir Holdings, LLC d/b/a Huntington Valley Healthcare Center; Olive Holdings, LLC  
13 d/b/a Aviara Healthcare Center; and Rosebud Holdings, LLC d/b/a Western Slope Health  
14 Center (collectively “Defendants”).
- 15
- 16 3. I was employed by Defendants as a Certified Nursing Assistant from approximately January  
17 2020 to August 2020 at Sunnyvale Health Center in Sunnyvale, California.
- 18
- 19 4. During my employment with Defendants, I experienced issues as set forth in the Complaints  
20 in these Actions including Defendants failing to pay for all hours worked; failing to pay  
21 minimum wage; failure to pay overtime; failing to provide or make available meal periods,  
22 failing to authorize or permit rest breaks; failing to properly compensate non-exempt hourly  
23 employees for missed rest periods and non-compliant meal breaks; failing to properly  
24 reimburse employees for business expenses; failing to provide timely and itemized wage  
25 statements; and failing to pay all wages owed upon separation.
- 26
- 27 5. I retained Schneider Wallace Cottrell Konecky LLP (“SWCK”) and Lawyers *for* Justice  
28 (“LFJ”) to represent me in this Action.
6. During this litigation, I have contributed numerous hours of my own time to the litigation of these claims and been in constant communication with my attorneys to keep apprised of the

1 status of the litigation and answer questions as needed. For example, prior to filing the  
2 Complaint in this Action, I had multiple telephonic interviews with my attorneys about my  
3 work experiences, possible claims, and my duties as a named plaintiff and Class representative  
4 in this litigation. I understand that these duties include participating actively in the litigation,  
5 reviewing significant events in the litigation, keeping abreast of the status and progress of the  
6 litigation, and considering the interests of the Class and putting those interests ahead of my  
7 own. I knew that there was no guarantee that we would be successful in this case, and that  
8 there was a significant chance of protracted litigation. I realized that my name would be on a  
9 Class Action. I also understood that I may be required to spend a significant amount of time  
10 on the discovery process.  
11

12 7. Before and during the two mediations in this Action, I was available to answer questions and  
13 strategize with my attorneys. I remained on-call during the mediations and stayed updated  
14 regarding their progress. Once we reached a settlement, I carefully reviewed the material  
15 terms, discussed it with my attorneys, and signed the Agreement on December 20, 2023.  
16

17 8. Throughout this litigation, I have been in constant communication with my attorneys to keep  
18 apprised of the status of the litigation and to answer questions as needed to pursue this case. I  
19 have kept up to date on the status at every phase.

20 9. In sum, I worked with my attorneys to prepare the Complaint, provided documents and  
21 information regarding my experience working for Defendants, stayed up to date on the  
22 mediation process and settlement decisions, and otherwise remained in constant contact with  
23 my attorneys.

24 10. To make this proposed Settlement a reality, I agreed to a general release. The general release  
25 encompasses all claims that I may have arising out of my employment with Defendants. In  
26 contrast, I understand that the release for putative Class members is limited to the facts and  
27 claims alleged in the Complaints. I agreed to the general release as a condition of Settlement  
28 to resolve my claims and the claims of the putative Class members.

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11. Aside from the payment I am eligible to receive as a putative Class member and an enhancement payment for serving as the class representative, subject to Court approval, I am not receiving any other benefits from this Settlement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 12 / 22 / 2023, 2023 in Sunnyvale, California.



\_\_\_\_\_  
Esther Corona