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8 *Attorneys for Plaintiff Alicia Ranillo*

**ENDORSED
FILED**

JAN 22 2019

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SONOMA

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SONOMA

13 ALICIA RANILLO, individually and on
14 behalf of all others similarly situated,

15 Plaintiffs,

16 v.

17 ENSIGN SONOMA LLC, a California
18 limited liability company, and DOE 1
19 through and including DOE 100,

20 Defendants.

Case No. SCV258369

**DECLARATION OF ALICIA RANILLO IN
SUPPORT OF PLAINTIFF'S MOTION
FOR CONDITIONAL CLASS
CERTIFICATION AND PRELIMINARY
APPROVAL OF CLASS-ACTION
SETTLEMENT**

1 Alicia Ranillo declares under penalty of perjury as follows:

2 1. I make this Declaration in Support of Plaintiff's Motion for Conditional Class
3 Certification and Preliminary Approval of Class Action Settlement. If sworn as a witness, I could
4 competently testify to each and every fact set forth herein from my own personal knowledge.

5 2. I worked for Ensign Sonoma LLC ("Ensign") as a Licensed Vocational Nurse ("LVN")
6 at its facility in Sonoma, California from March 2008 through September 2015. I was a non-exempt,
7 hourly employee. In my capacity as an LVN, I would generally work approximately 8 hours per day, but
8 in certain instances I was required to work overtime, or more than eight hours in a day. In those instances
9 when I worked overtime hours, Ensign failed to pay the correct hourly rate for overtime hours when I
10 also received shift-differential premium pay. Additionally, I was not always provided with a 10-minute
11 paid rest break for every four hours worked. Furthermore, I was not always provided with a timely 30-
12 minute meal break that started within the first five hours of my work day. Finally, I was provided with
13 paystubs from Ensign that did not include all of the information that is required to be listed on a paystub
14 pursuant to the California Labor Code, including the legal name of my employer, as well as all
15 applicable hourly rates.

16 3. In connection with this lawsuit, I feel as though I am a good representative of others who
17 have worked for Ensign. I have spent a great deal of time being educated on the relevant employment
18 laws, as well as being educated regarding issues related to acting as a class representative in a class
19 action lawsuit. My main concern is that all employees be treated fairly. As a class representative, if
20 preliminary approval of a class settlement is achieved, I understand that I will continue to act as a
21 representative of other, unnamed class members and that, as such a representative, I owe a duty of good
22 faith to the unnamed class members and I will not act just in my own self-interest. I believe I am
23 similarly situated with the potential members of the class in that, like me: (a) the potential members of
24 the class were employed by Ensign as hourly employees at its facility in Sonoma, California; (b) the
25 potential members of the class were not all routinely provided with timely and proper 10-minute rest
26 breaks and/or 30-minute meal periods; (c) the potential members of the class were not provided with
27 overtime payments based on the proper regular rate of pay, (d) the potential class members similarly
28 received paystubs that did not include all of the information required by the California Labor Code, and

1 (e) as a result of Ensign's employment practices, the potential class members have been damaged in that
2 they have not received timely payment in full of all earned wages.

3 4. My interest in prosecuting the lawsuit is to secure compensation for all of the members of
4 the class on account of Ensign's failure to comply with California labor laws. I have not been promised
5 any special monetary reward or treatment for acting as a class representative. I have no interest adverse
6 to the members of the class as a whole and I believe that my individual claims are typical of the claims
7 of the members of the class as a whole.

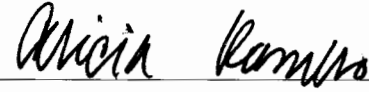
8 5. I first began speaking with my attorneys in the Fall of 2015. To this end, I met in person
9 with my attorneys to discuss my potential claims and the case. At the request of counsel, I searched my
10 personal files and provided my attorneys with all of the documentation and information that I had in my
11 possession that was potentially relevant to the case and my claims. With the assistance of my attorneys, I
12 was educated on the requirements of the California Labor Code regarding the provision of overtime
13 compensation, meal and rest breaks, as well as the information that an employer is required to provide to
14 its employees on their paystubs.

15 6. I have taken a very active role in this litigation by conferring with counsel and assisting
16 in gathering information for the prosecution of the lawsuit. Additionally, I was deposed for an entire
17 day in offices in downtown San Francisco. I have been working on this case with my attorneys for more
18 than three years and actively participated in the settlement process over the past six months. To that end,
19 I have reviewed the settlement agreement and believe that the terms are fair, adequate, and reasonable to
20 the class. I understand that my fiduciary obligations to the class will continue until all settlement
21 procedures are concluded and the settlement funds are distributed to the class members. I intend to
22 continue to take an active part in the litigation and to continue to participate in settlement procedures. I
23 understand that my fiduciary obligations to the class will continue until all trial and/or settlement
24 procedures are concluded and the settlement funds are distributed to the class members.

25 7. I have spent a tremendous amount of time assisting in the prosecution of the claims in
26 this action. Whenever my attorneys needed any information, I always made myself available. Indeed, I
27 have worked hard to provide my attorneys with documents, information and feedback that assisted in
28 prosecuting, and eventually settling, the claims that are the subject of this proposed settlement.

1 8. I have read the foregoing and the facts set forth herein and they are true and correct of my
2 own personal knowledge.

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4 Executed on January 16, 2019, in Marin County, California.

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Alicia Ranillo

1 **PROOF OF SERVICE**

2 I, J. Michael Solano, am over the age of eighteen years, and not a party to the within action. My
3 business address is North Bay Law Group, 116 E. Blithedale Avenue, Suite 2, Mill Valley, California
94941.

4 On January 22, 2019, I, J. Michael Solano, served the within document(s):

5 **DECLARATION OF ALICIA RANILLO IN SUPPORT OF PLAINTIFF'S MOTION FOR**
6 **CONDITIONAL CLASS CERTIFICATION AND PRELIMINARY APPROVAL OF CLASS-**
7 **ACTION SETTLEMENT**

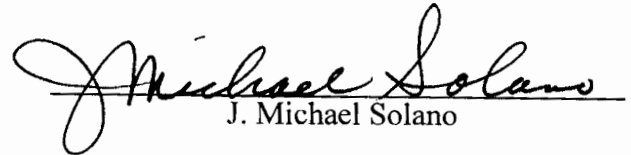
8 I caused such document to be delivered by regular mail:

9 I am readily familiar with the Firm's practice of collection and processing correspondence for mailing.
Under that practice, the document(s) would be deposited with the U.S. Postal Service on that same day
with postage thereon fully prepaid in the ordinary course of business, addressed as follows:

10 Julie Trotter
11 Delavan Dixon
12 CALL & JENSEN
610 Newport Center Drive, Suite 700
Newport Beach, CA 92660

13 I declare under penalty of perjury that the above is true and correct.

14 Executed on January 22, 2019, at Mill Valley, California.

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16 
17 J. Michael Solano