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NEW PRESIDENT, SAME OLD PROBLEMS?

**SEIU Heir Apparent April Verrett Has
History of Criticism and Controversy**

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SEIU Heir Apparent April Verrett Has History of Criticism and Controversy

Executive Summary

The *New York Times* recently noted that outgoing Service Employees International Union (SEIU) President Mary Kay Henry's replacement could be April Verrett, a high-ranking SEIU member.

Verrett has been the president of SEIU Local 215 (2019-2022) and is the current secretary treasurer of the SEIU International (2022-present).

Verrett is a controversial figure within her own union. She presided over two of the largest union staff strikes in American history and has been associated with several conflicts.

In 2022, SEIU Local 215 staged a strike against union leadership – notably President April Verrett – with workers complaining about management using union busting tactics and retaliating against its own employees. After the strike, several of the high-profile organizers were fired.

In 2023, issues with Verrett and SEIU staff members seemed to follow her to the union's headquarters in Washington D.C. Workers accused management – notably April Verrett and Mary Kay Henry – of utilizing “corporate tricks and delay tactics” to prevent negotiating with their own employees.

Verrett's issues were not just relegated to her own employees protesting the union, she was also implicated in hiring a disgraced union leader and was featured in a lawsuit for wrongful termination by a former employee who alleged discrimination and retaliation.

Unfortunately, it looks like SEIU members can expect more of the same with a president like April Verrett – a hypocritical leader with a track record of promoting bad actors and condoning the same union-busting tactics she condemns companies for carrying out.

Highlights

Pacific Northwest Staff Union Chapter 15 Strike (PNWSU Chapter 15)

- In 2022, SEIU Local 2015 staff (PNWSU Chapter 15) started one of the largest union staff labor strikes in American history.
- During the strike, Verrett and management of the union were accused of union busting, retaliation, and breeding a “culture of toxicity.”
- The same day the strike against the union started, Local 2015 management allegedly posted the jobs of the strikers on their job board.

SEIU International Contract Dispute

- The unionized staff at the SEIU National Headquarters, represented by Office and Professional Employees International Union Local 2, accused Verrett of utilizing “corporate tricks and delay tactics” during contract negotiations.

Rickman Jackson Hiring

- In 2019, Verrett rehired Rickman Jackson, an SEIU employee who was ordered to return over \$30,000 in money linked to a scandal and stripped of his leadership position as president of a Michigan Local.
- Jackson was the chief of staff to corrupt union leader Tyrone Freeman, who was sentenced to prison for mail fraud, embezzlement/theft of labor assets, false statements, and tax fraud charges. Jackson was linked to the illegal activities of Tyrone Freeman.
- Verrett allegedly hung up on members of SEIU Local 2015 after she was confronted about hiring Rickman Jackson.
- Verrett allegedly refused to hold weekly strategy meetings with the union’s members after the confrontation.

Wrongful Termination Lawsuit

- SEIU Local 2015 – along with Verrett – were sued for wrongful termination after a former employee made accusations against Rickman Jackson for discrimination and retaliation.
- SEIU Local 2015 denied the allegations, but the case went on to be settled in 2023.

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Background

President of SEIU Local 2015

- From 2019 to 2022, April Verrett was the President of SEIU Local 2015.
 - According to the Department of Labor's Online Public Disclosure Room:

File #	Report	Name	Type	Title
###-###		name contains		President
545-348	2022 (LM2)	APRIL VERRETT	OFFICER	PRESIDENT
545-348	2021 (LM2)	APRIL VERRETT	OFFICER	PRESIDENT
545-348	2020 (LM2)	APRIL VERRETT	OFFICER	PRESIDENT
545-348	2019 (LM2)	APRIL VERRETT	OFFICER	PRESIDENT

Pacific Northwest Staff Union Chapter 15 Strike (PNWSU Chapter 15)

SEIU Local 2015 Strike

- In 2022, PNWSU Chapter 15 (unionized SEIU employees) started a strike against SEIU Local 15.
 - According to a Nov. 16, 2022, *Local News Matters* article:

Union staff workers returned to their jobs Monday after reaching an agreement to end an unusual strike against the union that employs them, Service Employees International Union Local 2015.

The workers had been picketing outside SEIU offices in Sacramento, Los Angeles, San Jose, San Bernardino, Fresno and Oakland since Nov. 1. They accused SEIU 2015, a statewide union local that represents hundreds of thousands of long-term health care workers, of engaging in unfair labor practices by failing to bargain over a series of issues.¹

- The staff union claimed management – most notably Verrett – was deploying union-busting tactics on staff.
 - According to a Nov. 16, 2022, *Local News Matters* article:

Our strike pulled back the curtain on the extent to which SEIU 2015 Management is willing to deploy union-busting boss tactics typically seen by anti-union companies

¹ Zack Haber. (Nov. 16, 2022). Union reunited: Disgruntled SEIU staffers end strike against labor group that employs them. [Local News Matters](#).

and their Executives. While out on strike we were forced to file even more Unfair Labor Practice charges with the National Labor Relations Board (NLRB) for: surveillance, assault, and intimidation. PNWSU members, like the long-term care workers we represent, deserve a dignified and respectful work environment. Our Management, like the nursing home employers and corporate executive we fight against, must continue to be held accountable for their unlawful practices.

SEIU 2015's culture of toxicity has led to immense difficulty in attracting and retaining dedicated staff, resulting in high turnover, understaffing, and mental and physical health issues. We know that this has negatively impacted the quality of representation and organizing power available to our SEIU 2015 rank-and-file members and has taken a detrimental toll on the overall power of the union – despite being the second-largest Local in the country.²

➤ **The strike was one of largest union staff strikes in American history.**

- According to a Nov. 9, 2022, *Real News Network* article:

The ongoing strike is one of the largest union staff strikes in American history, according to the Pacific Northwest Staff Union (PNWSU) Chapter 2015, which represents the staff members who work for SEIU Local 2015. Since the strike began, pickets have spread to offices in San Bernardino, Fresno, Oakland, and San Jose. Staff organizers, research and policy analysts, staff working the union member help line, as well as staffers from the finance and contracts departments, all walked off the job.

➤ **After coming to an impasse, SEIU Local 2015 management made contract changes unilaterally.**

- According to a Nov. 9, 2022, *Real News Network* article:

In February 2022, after a number of proposals and counterproposals, Local 2015 management reportedly declared an impasse, imposed unilateral changes to the contract, and refused to bargain further with PNWSU. Management argued that the contract was almost expired and that they should wait to bargain a new full contract at the end of 2022. But the local's workers don't want to wait to solve 2021's problems.

➤ **Management allegedly ignored the actions of their unionized workers.**

- According to a Nov. 9, 2022, *Real News Network* article:

In March, PNWSU filed ULP charges against Local 2015's management with the National Labor Relations Board. For the next seven months, staff repeatedly asked management to come back to the bargaining table and engaged in a number of

² PNWSUC. (Nov. 13, 2022). [X](#)

workplace actions: they asked family and friends to text and email union officers, for instance; they also vocalized their positions in all-staff Zoom meeting chats and collectively changed their video backgrounds to the PNWSU logo. Management mostly ignored the actions, said Lampert, but they eventually started shutting down the Zoom chats and calling fewer all-staff meetings.

➤ **Two former staff members of SEIU Local 2015 alleged they were fired in retaliation for striking against the union.**

- According to a Feb. 7, 2023, *Local News Matters* article:

Service Employees International Union Local 2015 has terminated two of its Los Angeles-based union staff members just weeks after those workers returned from a strike.

The terminated employees played high-profile roles in the strike — on the picket line, at the negotiating table, and on social media. They both say they were fired in retaliation for those roles.

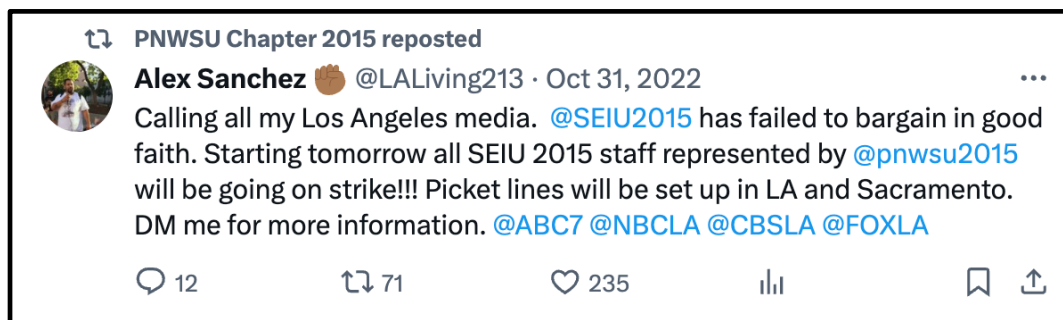
“Our terminations sent a message: don’t do too much, or there will be consequences,” said Jazmine Reyes, an SEIU communications specialist who lost her job along with Alex Sanchez, an SEIU organizing representative.³

Editor’s Note: Sanchez was one of the most vocal organizers targeting SEIU 2015 and his X posts can be read below.

X Posts Critical of SEIU 2015 and Verrett

➤ **In Oct. 2022, Sanchez (later terminated) announced the staff strike on X.**

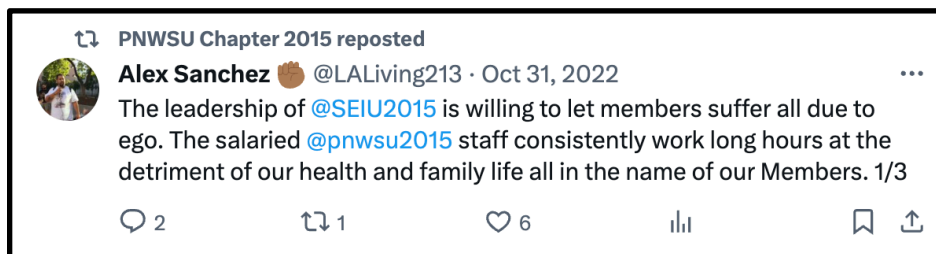
- According to the Oct. 31, 2022, X post:



³ Zack Haber. (Feb. 7, 2023). Two former high-profile SEIU staffers allege they were fired in retaliation for role in strike. [*Local News Matters*](#).

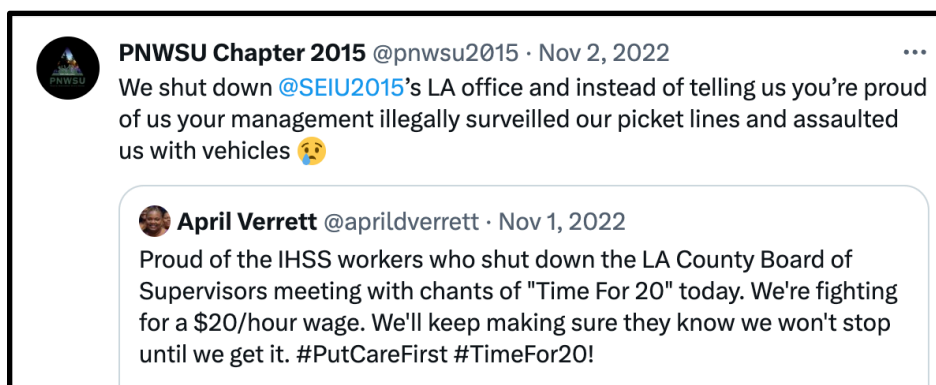
- Sanchez posted – and PNWSU Chapter 2015 reposted – a message claiming SEIU 2015 workers worked long hours at the detriment of their health.

- According to an Oct. 31, 2022, X post:



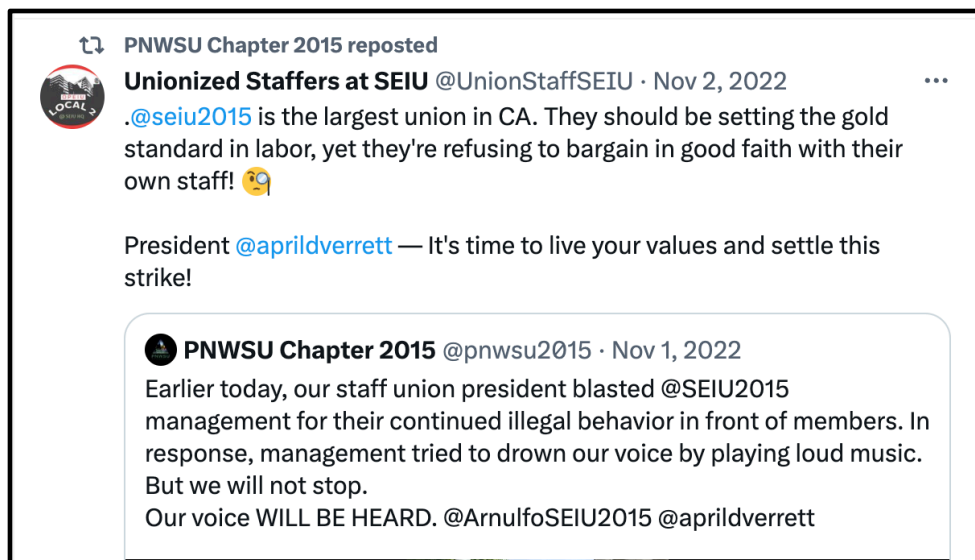
- The staff union criticized a post by Verrett that supported a \$20 minimum wage.

- According to the Nov. 2, 2022, X post:



- Unionized staffers of the SEIU international also criticized Verrett for her hypocrisy.

- According to a Nov. 2, 2022, X post:

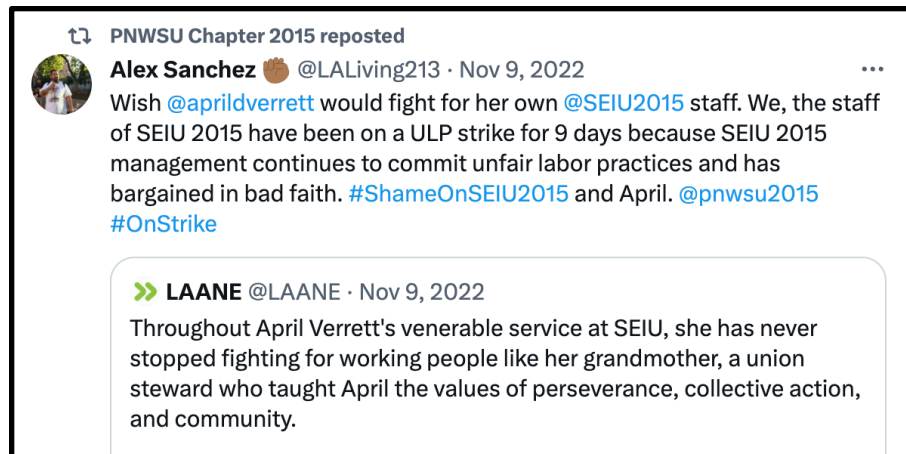


- During the strike the staff union showed a picture of all the SEIU 2015 jobs that had been posted on the first day of the strike.
 - According to a Nov. 3, 2022, X post:



➤ An SEIU 2015 staff member criticized Verrett.

○ According to the Nov. 9, 2022, X post:



SEIU International Contract Dispute

Criticism of Verrett During SEIU International Staff Union Dispute

- Unionized staffers of the SEIU International (OPEIU Local 2) accused Verrett and Mary Kay Henry of utilizing corporate tricks and delay tactics.
 - According to a May 9, 2023, X post:



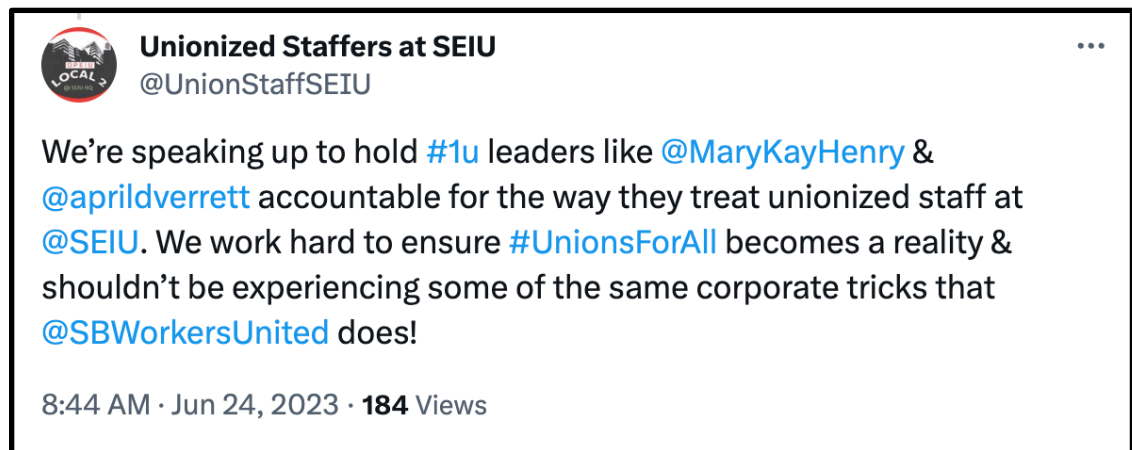
➤ In July 2023, the union once again criticized Verrett for utilizing delay tactics.

○ According to the July 29, 2023, X post:



➤ The union staff accused Verrett and Mary Kay Henry of treating union staff poorly.

○ According to the June 24, 2023, X post:



Rickman Jackson Hiring

Verrett Rehired a Controversial Employee

- **In 2019, Verrett allegedly announced she would be hiring a disgraced SEIU employee named Rickman Jackson and brushed off his corruption issues by comparing them to a “clerical error.”**

- According to a March 29, 2019, *Stern Burger with Fries* source claiming to have knowledge of the announcement:

His hiring was announced in a member conference call that takes place every Monday. This particular call, on February 25, made no mention of his hiring until the end of the call, with no discussion for members. The following week, April Verrett, president of 2015, discussed the hiring of Rickman where several members stated their opposition to his hiring because of what happened with Tyrone. Make no mistake, April did not say what Rickman did and only classified his actions as an error like a clerical mistake, because Rickman signed something he shouldn't have signed. She tried to justify his hiring as part of the union's Restorative Justice agenda, as if Rickman's corruption could compare to racist policies that make millions of people of color criminals rather than Rickman stealing from home care workers. Members were also angry there was no transparency because the executive board did not discuss this hiring, much less a discussion. April lied when she said the decision to hire Rickman was also because it was hard to find a director for external organizing. She said the union had been looking for 18 months for a director to fill the vacancy but the director had actually left around September 2018. When she was told Rickman had not repaid the local, she denied this but did not provide any evidence. She said she would provide the evidence at a later time and to the member who asked instead of the general membership.⁴

- **Jackson was stripped of his position at the SEIU in 2008 over corruption and ordered to return over \$30,000 linked to a spending scandal.**

- According to an Oct. 15, 2008, *Los Angeles Times* article:

The president of the Service Employees International Union's biggest Michigan local has been removed from office and must refund \$33,500 in housing payments that have been linked to a spending scandal at the parent organization's leading California chapter.

Rickman Jackson has agreed to return the money, will no longer serve on the SEIU's executive board and is cooperating with a federal criminal investigation of the Los Angeles-based chapter and other locals, according to union spokeswoman Michelle Ringuette.

⁴ (March 29, 2019). Guess Who's Back? Shady Rickman... Again. WTF!? [*Stern Burger with Fries*](#).

Jackson, who has been on leave and could not be reached late Tuesday, has been reassigned to a staff organizing job at a reduced salary and is barred from seeking union office for three years, Ringuette said. “These are serious penalties,” she said.

Jackson, whose Michigan local has 55,000 members, received \$196,000 in total compensation last year from the L.A. union and the national office, financial statements show. He previously served as chief of staff to the president of the L.A. chapter, Tyrone Freeman. The union has removed Freeman from the payroll pending the completion of an internal probe.⁵

➤ **Jackson’s former boss – Tyrone Freeman – was convicted on charges of embezzling tens of thousands of dollars from the SEIU.**

- According to a Jan. 28, 2013, Department of Justice press release:

Tyrone Ricky Freeman, the former president of Service Employees International Union (SEIU) Locals 6434 and 434-B, was convicted late this afternoon of federal charges of embezzling tens of thousands of dollars from the union that represents home healthcare workers.

Freeman, 43, who is currently residing in Pittsburgh, Pennsylvania, was found guilty of four counts of mail fraud, seven counts of embezzlement and/or theft of labor union assets, one count of making a false statement to a federally insured financial institution, and two counts of subscribing to a false tax return.⁶

Cancelled Meetings with Members Over Criticism

➤ **Verrett allegedly hung up on members of SEIU 2015 when they voiced their concern about hiring Rickman on a phone call.**

- According to a March 7, 2023, *LA Progressive* article:

SEIU International has a history of controversy. SEIU 2015 specifically has a history of scandals. About a decade ago, Rickman Jackson was accused of stealing tens of thousands of dollars from SEIU 6434, which was later renamed or rebranded as SEIU 2015. Jackson was re-hired at SEIU 2015 in 2019. According to Armstrong, union busters often refer to this 2013 article from the LA Times about Jackson’s boss, Tyrone Freeman, who was convicted of stealing hundreds of thousands of dollars from the union. Union busters say, “Why would you want to join a union that employs someone who worked for this guy?”

Members of SEIU 2015 remembered Jackson and opposed re-hiring him in 2019. They voiced their concerns directly to SEIU 2015’s then-president April Verrett on a

⁵ Paul Pringle. (Oct. 15, 2008). SEIU leader loses post over scandal. [Los Angeles Times](#).

⁶ (Jan. 28, 2013). Former President of SEIU Local Found Guilty of Stealing Tens Of Thousands Of Dollars From Union And Failing To Report Income. [Department of Justice](#).

conference call. According to Armstrong, Verrett hung up on them and then discontinued the weekly meetings where they were able to speak with and strategize directly with management and other workers across the state.⁷

Wrongful Termination/Retaliation Lawsuit

SEIU Local 2015 Sued for Wrongful Termination

- **In 2021, a former SEIU Local 2015 employee named Susana Villanueva sued the SEIU Local 2015 – along with Verrett and Rickman Jackson – for sexual discrimination and retaliation.**
 - According to the July 16, 2021, Complaint:
 1. DISCRIMINATION IN VIOLATION OF THE FEHA;
 2. HOSTILE WORK ENVIRONMENT HARASSMENT IN VIOLATION OF THE FEHA;
 3. RETALIATION IN VIOLATION OF THE FEHA;
 4. FAILURE TO PROVIDE REASONABLE ACCOMODATION IN VIOLATION OF THE FEHA;
 5. FAILURE TO ENGAGE IN THE INTERACTIVE PROCESS IN VIOLATION OF FEHA;
 6. FAILURE TO PREVENT DISCRIMINATION, HARASSMENT OR RETALIATION IN VIOLATION OF FEHA;
 7. BREACH OF EXPRESS ORAL CONTRACT NOT TO TERMINATE EMPLOYMENT WIHTOUT GOOD CAUSE;
 8. BREACH OF IMPLIED-IN-FACT CONTRACT NOT TO TERMINATE EMPLOYMENT WITHOUT GOOD CAUSE;
 9. NEGLIGENT HRING, SUPERVISION, AND RETENTION;
 10. WRONGFUL TERMINATION OF EMPLOYMENT IN VIOLATION OF PUBLIC POLICY;
 11. WHISTLEBLOWER RETALIATION (LABOR CODE & 1102.5);

⁷ Eli Gerzon. (March 7, 2023). “Bad Bosses” at the Largest Union Local in California. [*LA Progressive*](#)

12. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS⁸

➤ Villanueva reported the disparate treatment under Jackson to human resources after witnessing how two of her female co-workers were treated under his management (Avines & Hayes).

○ According to the July 16, 2021, Complaint:

b. Shortly after Villanueva was assigned to Jackson, Villanueva told Jackson that her son has autism and the earliest she could be in the office is 11:00 a.m., even though Villanueva conducted work duties, such as answering phone calls, since 9:00 a.m.

c. Beginning on or about February 2019 once Jackson became her supervisor, Villanueva noticed that Jackson giving preferential treatment to male employees. In or around March 2019, during several collaborative meetings with the team, Avines voiced her disagreement with some of Jackson's ideas for flyers, goals or ideas for the union. Because Avines was vocal about her vision for the union, Jackson transferred Avines out of the department, despite the collaborative nature of these meetings. However, Jackson did not transfer similarly situated, male employees who voiced their disagreements at these meetings out of the department.

d. In or about June 2019, Villanueva attended a work meeting where Hayes (a female) presented a campaign plan to Jackson for feedback. Without even looking at the plan, Jackson pushed it back to Hayes and said "You should look at Andres' plan. It's a better one." Andres was a male colleague of Hayes. Villanueva became frustrated with Jackson's disparate treatment between men and women and reported Jackson's disparate treatment to the Director of Human Resources Sabrina Neal ("Neal," who did not investigate.⁹

➤ After the complaint, Villanueva claimed her treatment became worse.

○ According to the July 16, 2021, Complaint:

e. After her complaint to Human Resources, Jackson emailed Villanueva that she was to start reporting to the office at 9:00 a.m., despite his knowledge of her autistic son's needs.

f. On or about July 22, 2019, Villanueva attended a meeting with Jackson and her subordinates. During the meeting, Jackson announced, "I spoke to Paul and we are going to make a departmental change. Now Paul is going to oversee part of Susana's work." Villanueva was confused and shocked at this sudden and unexpected announcement.¹⁰

⁸ *Villanueva v. SEIU Local 2015*, [Superior Court of California](#), July 16, 2021

⁹ *Villanueva v. SEIU Local 2015*, [Superior Court of California](#), July 16, 2021

¹⁰ *Villanueva v. SEIU Local 2015*, [Superior Court of California](#), July 16, 2021

➤ **Villanueva witnessed a female coworker being kicked out of a meeting after a confronting Jackson about his bias.**

○ According to the July 16, 2021, Complaint:

h. On or about August 5, 2019, Villanueva (who still had not heard back from human resources), attended a meeting with Jackson and other staff. During the meeting, Jackson said, “What do you think about this Paul?” Hayes replied, “You should ask everyone else not just Paul.” Jackson yelled and said, “Don’t start with me! Please excuse yourself from the meeting” and kicked Hayes out of the meeting. Villanueva, who was appalled and upset by Jackson’s continued hostility toward women, excused herself from the meeting and said, “I am not going to be part of a hostile environment” and left the meeting in tears.¹¹

➤ **After returning from a medical leave (for workplace stress), Villanueva met with an investigator to follow up on the human resources failure to resolve the hostile work environment created by Jackson.**

○ According to the July 16, 2021, Complaint:

i. On or about August 20, 2019, Villanueva reported to the investigator that human resources failed to take any action in response to her complaints of discriminatory treatment and hostile environment toward women. Villanueva further informed the investigator that she felt like she was stripped from her responsibilities by Jackson and her along with other female staff were being retaliated against. This interview lasted for four hours and the investigator informed Villanueva that the entire investigation was to last approximately five-to-six weeks.¹²

➤ **Villanueva alleges that she was pushed out of her department after the complaint.**

○ According to the July 16, 2021, Complaint:

n. On or about September 19, 2019, called Cruz back and said, “Rickman held a training meeting with the department managers and I was excluded from this meeting, can you clarify that I still have the same job title and description?” Cruz said, “You do not need to be in the training you can just sit tight at home and wait for details on your new assignment.” Villanueva responded, “am I still Deputy Director?” Cruz replied, “Your pay and title are not changing. But we are not going to hold you to the responsibilities of the department while you’re working with another person on a campaign.” Villanueva replied, “Am I being pushed out because it feels that way. I filed a complaint about discrimination and harassment, and I feel I am being retaliated against.” Cruz replied, “HR and attorneys are working on that

¹¹ Villanueva v. SEIU Local 2015, [Superior Court of California](#), July 16, 2021

¹² Villanueva v. SEIU Local 2015, [Superior Court of California](#), July 16, 2021

and I am not.” Cruz did not deny that Villanueva was being pushed out of the company or that she was discriminated, harassed and retaliated against.¹³

➤ **After experiencing medical issues, Villanueva alleges that she was placed on administrative leave.**

○ According to the July 16, 2021, Complaint:

u. On or about, January 22, 2020, Neal came into Villanueva’s office, handed her a letter and said, “you need to pick up your things and go home because you are being put on administrative leave. We are doing an investigation against you. We will discuss your (accommodation) request after the investigation.” Villanueva asked, “what are the allegations?” Neal replied, “Just go home.” Villanueva responded, “when you opened an investigation against Director Rick, you did not put him on administrative leave.” Neal, “I’m not going to sit here and argue. You should go home,” then left the office and slammed the door. Villanueva opened the letter provided by Neal which stated, “You are not to have contact with any staff from the Local, any of the members (more than 400,000), customers, or contractors. Your email and accounts have been blocked. You must ask HR before entering the office.” Villanueva was mortified and extremely anxious after this encounter and felt like after 25 years of service, she was being pushed out of the company.¹⁴

➤ **After returning, Villanueva alleged she continued to be treated poorly by Jackson and was terminated because of him.**

○ According to the July 16, 2021, Complaint:

bb. In or about May 2020, Jackson continued to treat Villanueva in a discriminatory manner and continued to strip her from her responsibilities. There was an instance when Villanueva sent an email to all of her subordinates and Jackson, requesting a copy of their campaign plans, work plans, and information so she could get up to speed. However, Jackson instructed Villanueva that all the coordinators would now be reporting directly to him and no longer to her.

cc. In or about May 2020, Jackson sent an email to Neal and Villanueva stating that Villanueva was not meeting expectations, despite a track record to the contrary.

15. Defendants’ termination of plaintiff’s employment: On or about June 19, 2020, to her surprise, Villanueva received a termination letter, falsely alleging that “Susana bullied/intimidated some staff and brought them to tears. Because this is an organization of homecare providers, there is a human side of it.”¹⁵

Defendant’s Answer

¹³ *Villanueva v. SEIU Local 2015*, [Superior Court of California](#), July 16, 2021

¹⁴ *Villanueva v. SEIU Local 2015*, [Superior Court of California](#), July 16, 2021

¹⁵ *Villanueva v. SEIU Local 2015*, [Superior Court of California](#), July 16, 2021

➤ **SEIU Local 2015 denied the allegations both generally and specifically.**

- According to the Oct. 4, 2021, Answer:

Pursuant to California Code of Civil Procedure §431.30, DEFENDANTS generally and specifically deny each and every allegation contained in the Complaint, and each and every part thereof, and each and every cause of action therein. DEFENDANTS further deny any and all wrongful conduct, whether or not alleged in the Complaint. DEFENDANTS also deny that PLAINTIFF suffered or incurred or will incur or will suffer any injury, loss or damages

Settlement

➤ **In 2023, the court filed a notice of settlement for the case.**

- According to the March 31, 2023, Notice of Settlement:¹⁶

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Carney R. Shegerian, Esq. (SBN 150461); Rosie Zilifyan, Esq. (SBN. 328868) Shegerian & Associates, Inc. 11520 San Vicente Boulevard, Los Angeles, California 90049 TELEPHONE NO.: (310)860-0770 FAX NO. (Optional): (310)860-0771 E-MAIL ADDRESS (Optional): CShegerian@shegerianlaw.com; RZilifyan@shegerianlaw.com ATTORNEY FOR (Name): Plaintiff, Susana Villanueva	FOR COURT USE ONLY Electronically FILED by Superior Court of California, County of Los Angeles 4/03/2023 12:00 AM David W. Slayton, Executive Officer/Clerk of Court, By A. Miro, Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk Courthouse	
PLAINTIFF/PETITIONER: Susana Villanueva DEFENDANT/RESPONDENT: SEIU Local 2015, et al.	
NOTICE OF SETTLEMENT OF ENTIRE CASE	CASE NUMBER: 21STCV26326
	JUDGE: Wendy Chang DEPT.: 36
NOTICE TO PLAINTIFF OR OTHER PARTY SEEKING RELIEF You must file a request for dismissal of the entire case within 45 days after the date of the settlement if the settlement is unconditional . You must file a dismissal of the entire case within 45 days after the date specified in item 1b below if the settlement is conditional . Unless you file a dismissal within the required time or have shown good cause before the time for dismissal has expired why the case should not be dismissed, the court will dismiss the entire case.	
To the court, all parties, and any arbitrator or other court-connected ADR neutral involved in this case: 1. This entire case has been settled. The settlement is: a. <input type="checkbox"/> Unconditional. A request for dismissal will be filed within 45 days after the date of the settlement. Date of settlement: b. <input checked="" type="checkbox"/> Conditional. The settlement agreement conditions dismissal of this matter on the satisfactory completion of specified terms that are not to be performed within 45 days of the date of the settlement. A request for dismissal will be filed no later than (date): June 1, 2023	

¹⁶ *Villanueva v. SEIU Local 2015*, [Superior Court of California](#), March 31, 2023