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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LASSEN

NATALIE CHRESTENSEN; DELORIS
RIDDLE, individuals, on behalf of themselves
and on behalf of all persons similarly situated,

Plaintiffs,

v.

NORTHEASTERN RURAL HEALTH
CLINICS, a California Corporation; and DOES
1-50, Inclusive;

Defendants.

Case No. 63703

**DECLARATION OF DELORIS RIDDLE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: November 8, 2022
Time: 9:00 a.m.

Dept.: 2

1 I, DELORIS RIDDLE, 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 the named Plaintiff in the above
4 wage and hour class and representative action filed against defendant NORTHEASTERN RURAL
5 HEALTH CLINICS (hereinafter "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 the Class Members that I am seeking
10 to represent.

11 4. I worked for Defendant as a non-exempt employee in California from June of 2017 to
12 February of 2021. During my employment, I worked as a financial counselor. At all times during my
13 employment, I was entitled to legally compliant meal and/or rest periods, minimum and overtime
14 wages, and reimbursement for required business expenses. Throughout my employment, I was subject
15 to Defendant's written policies and procedures contained in, among other documents, the
16 "Northeastern Rural Health Clinics Employee Handbook."

17 5. Generally, my lawsuit claims that Defendant failed to pay for all time worked, including
18 overtime compensation, failed to provide compliant meal and rest periods, failed to issue accurate
19 itemized wage statements, failed to reimburse for all required business expenses, and failed to pay all
20 wages when due.

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

1 7. Further, there is no conflict between my interests and the interests of the class that I am
2 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
3 I was injured by the same company-wide policies and practices to which the proposed Class was
4 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
5 of the Class by initiating this litigation, participating in mediation, and evaluating the proposed
6 settlement to assure that it is fair.

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

16 9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
17 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
18 humbly, I ask the Court to grant preliminary approval of the Settlement and all of its terms.

19 I declare under the penalty of perjury under the laws of the State of California that the foregoing
20 is true and correct. Executed on Oct 5, 2022, at Lassen County, California.

21 *Deloris Riddle*

22 By: Deloris Riddle (Oct 5, 2022 17:43 PDT)

23 DELORIS RIDDLE
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