

1 **HAIG B. KAZANDJIAN LAWYERS APC**

2 Haig B. Kazandjian, Esq. (#278622)

3 haig@hbklawyers.com

4 Raffi Tapanian, Esq. (#345246)

5 raffi@hbklawyers.com

6 801 N. Brand Blvd. Suite 970

7 Glendale, CA 91203

8 Telephone: (818) 696-2306

9 Facsimile (818) 696-2307

10 Attorneys for Plaintiffs Roscoe Simpson
11 on behalf of himself and all other similarly situated

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **FOR THE COUNTY OF SAN FRANCISCO**

14 BRITTANI POWELL, MELANIE
15 MCCONNAUGHY, and ROSCOE SIMPSON
16 individuals, on behalf of themselves, and on
17 behalf of all persons similarly situated,

18 Plaintiffs,

19 vs.

20 CORE COMMUNITY ORGANIZED
21 RELIEF EFFORT, a California Nonprofit
22 Corporation and DOES 1 through 50,
23 Inclusive;

24 Defendants.

CASE NO.: CGC-21-596527

*[Assigned for all purposes to the Honorable
Anne-Christine Massulo - Dept. 610]*

CLASS ACTION

**DECLARATION OF ROSCOE SIMPSON IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT**

Action Filed: November 8, 2021

FAC Filed: June 21, 2023

Trial Date: None Set

25 **DECLARATION OF ROSCOE SIMPSON**

26 I, Roscoe Simpson, hereby declare as follows:

27 1. I am over 18 years of age and a resident of California. I am one of the class
28 representatives in the above-captioned case, and I have personal knowledge of the facts and
statements set forth in this declaration, and if called upon to testify, I could and would competently
testify thereto.

2. I was employed by Core Community Organized Relief ("Defendants") as an hourly-
paid, non-exempt employee from approximately November 2020 until on or about April 21, 2022.

1 During this time, I worked as a site manager. I contacted the Haig B. Kazandjian Lawyers APC and
2 spoke with Haig B. Kazandjian, Esq. I consulted with the attorneys for almost six (6) hours
3 regarding my situation, class action lawsuits in general, and what it meant to be a class
4 representative. In my capacity as an employee of Defendants, I felt that I was in a unique position
5 to offer insight as to Defendants' wage and hour practices. I also wanted to ensure that Defendants
6 paid me and other employees what was owed to us and that Defendants stopped their practice of
7 not properly compensating their employees for all hours worked and non-compliant meal and rest
8 breaks, as well as reimbursing its employees for business expenses.

9 3. Since becoming involved in this case, I have spent over eight (8) hours meeting with
10 my attorneys concerning the case and fulfilling my responsibilities as a class representative, which
11 included gathering documents concerning my employment with Defendants, reviewing documents
12 with my attorneys and answering their questions, speaking with other current and former
13 employees of Defendants, providing guidance regarding the duties of hourly, non-exempt
14 employees, and helping develop a strategy as to what documents to obtain from Defendants. I
15 routinely checked in with my attorneys and their staff to make sure that they had all of my most
16 current information and any additional information that I had obtained from speaking with other
17 employees.

18 4. Throughout the case, I was available to answer any questions my attorneys had, and
19 I was available to speak and meet with my attorneys whenever they needed me. I responded to
20 them as quickly as possible and gave them as much information as I could. I spent additional hours
21 speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys
22 with documents and information for the purposes of discovery, and also describing documents,
23 policies, practices, and procedures of Defendants.

24 5. I routinely checked in with my attorneys and their staff to make sure that they had
25 all of my most current information and any additional information that I had obtained.

26 6. As such, throughout the case, I demonstrated what it takes to be an adequate class
27 representative by making myself constantly available to my attorneys, answering any questions my
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1 attorneys had, and speaking and meeting with my attorneys whenever they needed me. I responded
2 to my attorneys as quickly as possible and gave them as much information as I could.

3 7. As far as the settlement is concerned, I was available to review documents and
4 answer any questions my attorneys had. I spent extensive time assisting my attorneys to prepare for
5 private mediation in this matter and to review the documents and data Defendants produced in
6 connection to mediation. I spent additional hours reviewing the short-form, long-form, and revised
7 settlement agreement (collectively, "Settlement Agreements"), reviewing and discussing the
8 contents of the Settlement Agreements with my attorneys and asking questions and discussing the
9 potential settlement with my attorneys before signing the settlement agreements.

10 8. I believe that I have done everything that my attorneys have asked of me and have
11 tried, to the best of my ability, to represent the class. I understand, and willingly accept my
12 fiduciary obligations to prosecute this case on behalf of the employees that make up the absent
13 class members. I think my efforts helped to get the result obtained in this case, and as a class
14 representative, I respectfully request that the Court award me a service award payment in the
15 amount of twelve thousand five hundred dollars (\$12,500.00) for my active participation in this
16 case. Taking into consideration the time that I have dedicated to this case, I believe that this
17 amount is reasonable.

18 9. I am not related to anyone associated with the Haig B. Kazandjian Lawyers, APC.

19 10. I have not entered into any undisclosed agreements nor have I received any
20 undisclosed compensation in this case. The only compensation I will receive is whatever amount
21 the Court awards as an enhancement payment, as well as my share of the settlement fund as a class
22 member.

23 11. I understand that Haig B. Kazandjian Lawyers APC, JCL Law Firm, APC, and
24 Zakay Law Group, APLC will share the attorney fees in this action. I agreed to this in writing. I
25 understand that the amount of attorney's fees will not increase as a result of this fee sharing.

26 I declare under penalty of perjury under the laws of the State of California that the
27 foregoing is true and correct. Executed this 1st day of February, 2024, at Los Angeles, California.
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Roscoe Simpson

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