

**JCL LAW FIRM, APC**

Jean-Claude Lapuyade (State Bar #248676)  
Sydney Castillo-Johnson (State Bar #343881)  
Monnett De La Torre (State Bar #272884)  
5440 Morehouse Drive, Suite 3600  
San Diego, CA 92121  
Telephone: (619) 599-8292  
Facsimile: (619) 599-8291  
[jlapuyade@jcl-lawfirm.com](mailto:jlapuyade@jcl-lawfirm.com)  
[scastillo@jcl-lawfirm.com](mailto:scastillo@jcl-lawfirm.com)  
[mdelatorre@jcl-lawfirm.com](mailto:mdelatorre@jcl-lawfirm.com)

**ZAKAY LAW GROUP, APLC**

5440 Morehouse Drive, Suite 3500  
San Diego, CA 92121  
Telephone: (619)255-9047  
Facsimile: (858) 404-9203  
[shani@zakaylaw.com](mailto:shani@zakaylaw.com)

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SAN FRANCISCO**

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

Plaintiffs,

vs.

CORE COMMUNITY ORGANIZED RELIEF  
EFFORT, a California Nonprofit Corporation  
and DOES 1 through 50, Inclusive,

Defendants.

Case No. CGC-21-596527

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

Date: September 4, 2023  
Time: 9:30 a.m.

Judge: Hon. Samuel K. Feng  
Dept.: 302

1 I, BRITTANI POWELL, 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 lead named Plaintiff in the  
4 above wage and hour class action filed against CORE COMMUNITY ORGANIZED RELIEF  
5 EFFORT, a California Nonprofit Corporation (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 was employed by Defendant from January of 2021 to approximately May 26, 2021, as  
12 a non-exempt employee. At all times during my employment, I was denied legally compliant meal and  
13 rest periods, minimum wages and overtime compensation. Throughout my employment, I was subject  
14 to Defendant’s written policies and procedures contained in, among other documents, the “Employee  
15 Handbook.”

16 5. Generally, my lawsuit claims that Defendant failed to pay for all time worked, including  
17 reporting time pay and split shift premiums, failed to provide compliant meal and rest periods, failed  
18 to reimburse for mandatory business expenses, failed to furnish accurate itemized wage statements,  
19 and failed to pay all wages upon separation.

20 6. I believe that my claims are typical of the claims of the Class Members that I am seeking  
21 to represent because I was subject to the same alleged unlawful employment policies and practices at  
22 issue in this action, including but not limited to, Defendant’s failure to provide compliant meal and  
23 rest periods, failure to reimburse for mandatory business expenses, failure to furnish accurate itemized  
24 wage statements, failure to pay for all hours worked, including reporting time pay and split shift  
25 premiums, and failure to pay all wages when due. Factually, Defendant’s policies and practices apply  
26 class wide, and Defendant’s liability can be determined by 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, undertaking extensive class discovery, and evaluating the  
6 proposed settlement to assure that it is fair.

7           8. I understood that at the time I filed this action, as a Class Representative, I owed a duty  
8 to the putative class members to faithfully prosecute this action with their best interests at the forefront  
9 of every decision. I understood that I could not make any decision in this action for the sole benefit  
10 of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice  
11 my personal best interests for the benefit of the interests of the putative class members. Nevertheless,  
12 I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my  
13 former co-workers for what I perceived to be Defendant's unlawful wage and hour practices. I believe  
14 that I faithfully executed the duties of a Class Representative throughout this litigation and will  
15 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, 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 Jul 28, 2023, at oakland, California.

21   
22 By: britanni powell (Jul 28, 2023 12:01 PDT)  
23 BRITTANI POWELL  
24  
25  
26  
27  
28