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Attorneys for Plaintiffs SHIRLEY GOEMAAT
and REHANA BALUCH

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER

SHIRLEY GOEMAAT and REHANA BALUCH,
individually, and on behalf of others similarly
situated and aggrieved,

Plaintiffs,

vs.

ORANGE COUNTY ASSOCIATION FOR
MENTAL HEALTH, a California Corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 30-2019-01106371-CU-BT-CXC

*[Assigned for all purposes to the Hon. Peter
Wilson, Dept CX101]*

**DECLARATION OF REHANA BALUCH IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT
(RELATED TO ROA #125)**

Date: January 26, 2022
Time: 2:00 PM
Dept: CX101

Complaint filed: October 21, 2019
FAC filed: June 12, 2021
Trial date: None set

DECLARATION OF REHANA BALUCH

I, Rehana Baluch, hereby declare as follows:

1. I am a plaintiff and proposed Class Representative in the above-captioned class and representative action, *Goemaat, et al. v. Orange County Association for Mental Health*, Orange County Superior Court, Case No. 30-2019-01106371-CU-BT-CXC.

2. I am over 18 years of age and make this declaration based on my personal knowledge. If called as a witness, I could and would testify competently thereto.

3. This declaration is submitted in support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement.

4. Defendant Orange County Association for Mental Health ("Defendant" or "OCAMH") provides direct services, advocacy, education, and information dissemination to residents of Orange County who are impacted by mental illness. I worked for Defendant as a non-exempt employee at the South County Wellness Center in Lake Forest, California, from approximately August 3, 2017, through May 2018.

5. Defendant originally hired me as a part-time Peer Mentor but re-classified me as a full-time employee on or around October 1, 2017.

6. I seek to represent current and former non-exempt employees who worked for Defendant in California and were subject to the same uniform policies and procedures with respect to timekeeping and payroll.

7. It was challenging for me, and I believe it would be challenging for anyone else, to come forward as a class representative and remain actively involved throughout the life of this case based upon the negative experiences I had while employed at OCAMH. It has been painful for me to relive this part of my life throughout my involvement in this lawsuit.

8. Despite my concerns about the risks of putting my name on this lawsuit, I decided to pursue these claims because I believe that Defendant should be held accountable for how it has treated its employees. However, I do worry about the negative impact the lawsuit may have on my reputation and job prospects in the mental health services community. For example, since bringing the lawsuit, I have been contacted by 5 or 6 different individuals, who told me they heard I was suing OCAMH. This shows

1 that I am taking risks with my reputation and future career opportunities in order to represent the class. I
2 worry that other potential employers in the mental health services community will hear about it, since it's
3 a very small industry.

4 9. Prior to retaining The Kick Law Firm as my attorneys, I spent numerous hours reviewing
5 employment documents, researching what kind of laws may have been violated, and trying to find
6 attorneys who could help bring the lawsuit. I also spent time driving to meet with attorneys to discuss my
7 potential claims. I conservatively estimate that I spent approximately 100 hours preparing to bring this
8 lawsuit.

9 10. Since retaining my attorneys, I estimate that I have spent at least an additional 80 hours
10 being involved in this case. For over three years, I have maintained regular contact with my attorneys and
11 received updates from them. I have spent many hours reviewing documents and providing my attorneys
12 with information whenever they requested it. On the day of mediation, I made remained available and
13 near the phone. My attorneys kept me informed about all settlement negotiations and sought my opinion.
14 I have reviewed the proposed settlement and conferred extensively with my attorneys about its pros and
15 cons.

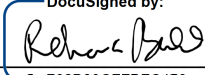
16 11. During this lawsuit, I also incurred significant unreimbursed expenses related to the case.
17 For instance, I spent about \$400 on printing, boxing up, and mailing documents to my attorneys, on top
18 of the cost of purchasing a new printer for approximately \$475, which I needed for this case.

19 12. Before and during the litigation, I was advised by my attorneys about my duties and
20 responsibilities as a representative for other current and former employees. I have taken these duties
21 seriously and was actively involved in my case throughout, as described above. I understand the factual
22 allegations, and, as far as I am aware, my experience is typical of Defendant's employees in California. I
23 have no interest that is adverse to, or even substantially different from, any other employee.

24 13. I was never offered anything to serve as the class representative, and I understand that my
25 duty to the class is ongoing until the litigation is fully resolved. I am not seeking any compensation from
26 the litigation other than an individual class award and class representative service award, if approved by
27 the Court. Ultimately, I believe the settlement is fair, adequate, and reasonable because it holds Defendant
28 accountable and will actually provide money to the proposed class, sooner rather than later.

1
2 I declare, under penalty of perjury under the laws of the State of California, that the foregoing is
3 true and correct to the best of my belief and knowledge.

4 Executed on 1/11/2023 in Laguna Woods, California.

5 DocuSigned by:
6 
7 _____
8 Rehana Baluch
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