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6 Attorneys for Plaintiffs SHIRLEY GOEMAAT
 and REHANA BALUCH
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

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

12 Plaintiffs,

13 vs.

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

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

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

**DECLARATION OF SHIRLEY GOEMAAT
 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 SHIRLEY GOEMAAT

I, Shirley Goemaat, 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 Wellness Center South in Lake Forest, California, from approximately November 25, 2015, through November 2016.

5. Defendant originally hired me as a part-time Peer mentor, but I regularly worked forty (40) hours or more each week during my employment.

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 a very difficult decision for me to bring this lawsuit against OCAMH and put my name out there as a class representative in this case. The non-profit mental health services industry is a tight-knit community, so I feel that bringing this lawsuit may limit my job opportunities in the industry, which is a real concern for me as I am currently studying to become a licensed psychologist. In addition, I recognize that because of this lawsuit, I can likely no longer use my former employer as a positive employment reference. Despite this, I decided to pursue these claims because I believe that Defendant should be held accountable for how it treats its employees.

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1 8. Based on my experiences working for OCAMH, I believe it would be difficult to get other
2 employees to come forward as class representatives for fear of retaliation. Additionally, based on my
3 conversations with other past employees, I believe most others would prefer to move on from their past
4 negative experiences rather than serve as a class representative.

5 9. Before retaining The Kick Law Firm as my attorneys, I spent considerable time conducting
6 research into applicable laws and what I believe Defendant has violated, reviewing documents, and
7 looking for a qualified counsel to take this case, including meeting with attorneys. I estimate that I spent
8 at least 100 hours preparing to bring this lawsuit.

9 10. After retaining my attorneys, I was actively involved with the case. For instance, I spent a
10 significant amount of time organizing the names of the individuals who I knew were involved and reaching
11 out to at least four witnesses to gather information regarding their similar experiences. Moreover,
12 throughout the litigation, I have maintained regular contact with my attorneys and received updates from
13 them. I spent time being on call by the phone during the mediation, and my attorneys kept me informed
14 about all settlement negotiations and sought my opinion. I have reviewed the proposed settlement and
15 conferred extensively with my attorneys about its pros and cons. I estimate that I have spent at least an
16 additional 80 hours being involved in this case since retaining my attorneys.

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

22 12. I was never offered anything to serve as the class representative, and I understand that my
23 duty to the class is ongoing until the litigation is fully resolved. I do not anticipate receiving any benefit
24 as a result of my participation other than my individual class member award, and if approved, the requested
25 service award. Ultimately, I believe the settlement is fair, adequate, and reasonable because it holds
26 Defendant accountable and will actually provide money to the proposed class, sooner rather than later.

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

3 Executed on 1/11/2023 in San Clemente, California.

4 DocuSigned by:
5 Shirley Goemaat
6 Shirley Goemaat
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