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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

LAVEDA SCOTT, as an individual and on behalf
of all others similarly situated, and as a private
attorney general,

Plaintiffs,

vs.

HUMANGOOD, a California corporation;
HUMANGOOD NORCAL, a California
corporation; HUMANGOOD SOCAL, a
California corporation; HUMANGOOD
FRESNO, a California corporation;
HUMANGOOD AFFORDABLE HOUSING, a
California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. CIVDS2016835

[Hon. David Cohn, Department S26]

**DECLARATION OF LAVEDA SCOTT IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: February 14, 2023
Time: 10:00 a.m.
Department: S26

Complaint Filed: September 1, 2020

1 I, LaVeda Scott, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. I began working for HumanGood in or about November of 2019 and worked in
7 California for 30 or more days within a year. Throughout my employment as a certified nursing
8 assistant, I was paid on an hourly basis as a non-exempt employee. During my employment, the
9 company did not permit me to leave the work premises during my rest breaks. Rather, the company
10 required me to respond to any of the residents' needs during my rest breaks. HumanGood would also
11 routinely delay, interrupt, or prevent me from taking meal periods for various reasons, including when
12 required to respond to any of the residents' needs. I am informed and believe that I was not paid all
13 premiums for missed rest breaks and meal periods. I also am informed and believe that the company was
14 required to use the regular rate of pay for other wages, including overtime and holiday pay, and that I
15 was underpaid. I also am informed and believe that the company did not provide me with lawful wage
16 statements.

17 3. During the pendency of this lawsuit, I have done my best to represent the interests of the
18 employees that are part of the class. I have actively contributed to the litigation of this case. My
19 contributions include but are not limited to (i) participating in numerous telephonic meetings with my
20 attorneys and their staff to discuss the case and review documents prepared on my behalf, (ii) providing
21 my attorneys with information and documents regarding my employment with Defendant, (iii) searching
22 for additional information and documents requested by my attorneys, (iv) reviewing and approving the
23 written notice to the Labor and Workforce Development Agency and the complaint and other papers
24 filed with the court, (v) participating in mediated settlement discussions, (vi) reviewing and executing
25 the settlement agreement, and (vii) reviewing and signing the declarations submitted to this Court in
26 support of the settlement.

27 4. I understand that the class claims alleged in this action were brought on behalf of other
28 similarly situated employees, and thus I am acting as a representative for the Class. I understood that an

1 individual case would have resolved much faster than a class action and involved much less financial
2 risk than a class action.

3 5. Throughout the lawsuit, I have been kept apprised of the status of this case. As the class
4 representative, I understand that it is my responsibility to act in the Class's best interest and not my own.
5 I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any
6 conflicts that exist between my interest and the interests of the Class that would impair or affect my
7 ability to serve as representative for the Class.

8 6. I have and continue to be willing to assist in the investigation of this matter as well as
9 make myself available for trial or any further proceeding in this matter as required to represent the
10 interests of the Class. I also understand my duties and responsibilities to the proposed class and will
11 carry out those duties as necessary.

12 7. I have discussed the terms of the settlement agreement with my attorneys, and based on
13 my understanding of the case, I am of the opinion that settlement for the consideration and on the terms
14 set forth in the settlement agreement are fair, reasonable, and adequate, and in the best interests of the
15 Class.

16 8. I understood that filing this lawsuit is a public record and I accepted that burden. This
17 lawsuit is something that potential employers can look into, and which may cause a negative impact of
18 my employment prospects. I also understood that there were risks due to my involvement as a named
19 plaintiff in a representative lawsuit against a large employer. For instance, if I lost, I might have to face a
20 judgment for some of Defendant's legal costs. Even understanding all these risks, I was willing to move
21 forward and bring this case on behalf of the other employees.

22 9. As part of the settlement, I also agreed to sign a general release of claims and a waiver of
23 Civil Code section 1542.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is
25 true and correct. Executed this 13th day of January 2022, at Hemet, California.

26 DocuSigned by:

D2B4EE91FAB14FD...

27 LaVeda Scott
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