

DIVERSITY LAW GROUP, P.C.
Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Simon L. Yang (State Bar No. 260286)
sly@diversitylaw.com
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile: (213) 488-6554

Attorneys for Plaintiff and the Class

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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 12, 2022
Time: 10:00 a.m.
Department: S26

Complaint Filed: January 25, 2021

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. I have taken all necessary steps to represent the interests of the Class, including by
18 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
19 and answering any questions that have come up, including about how I was paid or what my wage
20 statements show or meant. I understand that I am responsible to the Class with respect to trying the case,
21 appearing in court, and working with Class Counsel. I am willing to act as a fiduciary for the Class. I
22 remain willing to devote my time to this lawsuit for the benefit of the Class. I do not believe I have any
23 interests that are adverse to the interests of the Class. I also am unaware of any such issues having been
24 raised or presented by anyone else.

25 4. I believe many employees would not sue their employer out of fear. I took on risks by
26 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have
27 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class
28 settlement is fair, adequate, and reasonable.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed this 16th day of September 2022, at Hemet, California.

3 DocuSigned by:
4 
5 D2B4EE91FAB14FD...

LaVeda Scott