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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

ASHLEY SIMPSON, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

CHOICE HOMECARE, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 19STCV20172

Honorable Kenneth R. Freeman
Department SSC14

CLASS ACTION

**DECLARATION OF ASHLEY SIMPSON
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Edwin Aiwazian); and [Proposed]
Order filed concurrently herewith.]

Date: March 30, 2021
Time: 10:00 a.m.
Department: SSC14

Complaint Filed: June 11, 2019
FAC Filed: October 11, 2019
SAC Filed: December 30, 2019
Jury Trial: None Set

DECLARATION OF ASHLEY SIMPSON

I, **Ashley Simpson**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Choice Home Care, Inc. ("Choice Home Care") in an hourly-paid, non-exempt position from approximately December 2015 to August 2017. I decided to seek legal advice about my work experiences with Choice Home Care and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Choice Home Care paid me and other employees what was owed to us for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 7 hours to discuss my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and, eventually, a PAGA representative.

3. I have spent over 18 hours meeting with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents concerning my employment with Choice Home Care, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the work performed by non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Choice Home Care. I frequently checked in with my attorneys and their staff to make sure that they had my most current information and any additional information that I had obtained.

4. Throughout the case, I was available to answer any questions my attorneys had, and available to speak and meet with them whenever they needed me. I responded to my attorneys as quickly as possible and gave them as much information and identified as many

documents as I could. I spent at least 12 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Choice Home Care. During the discovery phase of the litigation, I spent approximately 11 additional hours reviewing Choice Home Care's discovery requests, locating documents, and providing documents and responses to my attorneys.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 3 hours reviewing the settlement documents and about 2 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement papers.

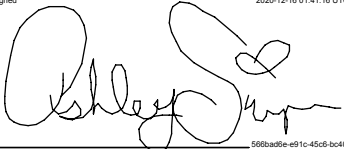
6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class and proposed PAGA representative, I respectfully request that the Court award me an enhancement award in the amount of \$15,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement fund as a class member.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 15, 2020, at Los Angeles, California.

Electronically Signed 2020-12-16 01:41:16 UTC - 172.58.16.25

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Ashley Simpson