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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

TAMIKO BROOKS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

v.

HOME CARE ASSISTANCE OF
CALIFORNIA, LLC, a Delaware Limited
Liability Company; HOME CARE
ASSISTANCE, INC., a California
Corporation; HOME CARE ASSISTANCE,
LLC, a Delaware Limited Liability
Company, and DOES 1 through 100,

Defendants.

Case No.: 21STCV06850

*[Case assigned for all purposes to the Hon.
Stephanie M. Bowick, Dept. 19]*

**DECLARATION OF ALYSSA WEBB-
BRUNER IN SUPPORT OF MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (LABOR CODE § 2698,
ET SEQ.) SETTLEMENT AGREEMENT**

Complaint Filed: February 22, 2021

Trial Date: None Set

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I, **ALYSSA WEBB-BRUNER**, hereby declare as follows:

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

2. I was previously employed by Defendant TheKey of California, LLC f/k/a Home Care Assistance of California, LLC (“Defendant”) as a non-exempt caregiver employee during the relevant time period. Throughout my employment, I was often forced to forgo taking compliant breaks (*e.g.*, missed, late, short) due to the nature of my work, heavy workloads, understaffing, and supervisory interference. After I quit, I decided to seek legal advice about my work experience at Defendant and explore the possibility of filing a lawsuit to redress my grievances. I contacted Justice Law Corporation and spoke with the attorneys there, including Douglas Han, Esq., to seek legal consultation. During this time, Mr. Han informed me about other potential wage-and-hour violations (*e.g.*, not being compensated for all hours worked, not being reimbursed for all business expenses). Once I realized what had happened, I wanted to do whatever I could to ensure that Defendant paid what was owed and stopped its improper practices.

3. Mr. Han explained to me the possibility of starting a representative Private Attorneys General Act of 2004 (“PAGA”) action. Mr. Han also informed me that I may have to sacrifice my potential individual claims in exchange for pursuing claims on behalf of California and other aggrieved employees under PAGA. Mr. Han even told me of the risks and sacrifices associated with serving as a representative (*e.g.*, risking a judgment of attorneys’ fees and costs entered against me, agreeing to a broader release). I struggled with the decision to bring my own claims versus pursuing claims on behalf of California and other aggrieved employees. I told Mr. Han that I would be in touch with him and his team.

4. After my initial consultation, I investigated PAGA lawsuits on my own and did some research into the leading California employment law firms, which took about two (2) hours. I then consulted with the attorneys at Justice Law Corporation for around one and one-half (1.5) hours to further discuss my situation, PAGA lawsuits in general, and what it meant to serve

1 as the proxy of the state. I decided to bring a representative PAGA action to end Defendant's
2 unlawful practices and redress the grievances of the other aggrieved employees and myself.

3 5. I spent over forty-five (45) hours meeting with my attorneys concerning this
4 case and performing my responsibilities as a named plaintiff. These many responsibilities
5 included, among other things: (a) gathering my employment documents (*e.g.*, personnel records)
6 to give my attorneys a better understanding of the policies, practices, and procedures I was exposed
7 to; (b) reviewing documents with my attorneys and answering any pertinent questions and
8 inquiries; (c) providing the names and contact information of putative aggrieved employees for
9 my attorneys to locate and interview to strengthen my allegations; (d) speaking with other current
10 and former employees of Defendant to gather support for my claims; (e) providing guidance
11 regarding other employees' duties and responsibilities; (f) discussing my employment experience
12 (and work environment); (g) reviewing the operative complaints and Settlement Agreement; (h)
13 looking over the written notices sent to the California Labor and Workforce Development Agency
14 and Defendant; (i) aiding my attorneys look over Defendant's answers to the operative complaints;
15 (j) helping my attorneys develop a strategy to obtain additional documents from Defendant and
16 other sources; (k) reviewing the formal discovery requests, including the responses; (l) gathering
17 the necessary documents and information to respond to the formal discovery requests; (m)
18 preparing for and attending my deposition; and (n) preparing for and making myself available all
19 day to remotely participate in and provide my input for mediation. I also checked in with my
20 attorneys and their staff to ensure they had my most current information and any additional
21 material that I obtained from speaking to current and former employees of Defendant.

22 6. Throughout this matter, I have made myself available to meet and speak
23 with my attorneys whenever they needed me. I have responded to my attorneys' questions and
24 inquiries as quickly as possible and gave them as much information as I could gather (*e.g.*, names
25 and contact information of putative aggrieved employees, various violations that I experienced and
26 witnessed, policy documents that I received during my employment). I have spent at least seven
27 to eight (7-8) additional hours discussing the case with my attorneys (*e.g.*, applicable legal theories
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to explore, pertinent information to request, importance of the documents produced, relative strengths of my allegations) and sending them relevant documents and information that I obtained.

7. The description of my work experience coupled with authorizing the receipt of my employment documents helped my attorneys develop their legal theories and determine the extent and frequency of the day-to-day violations. By extension, supplying the names and contact information of putative aggrieved employees allowed my attorneys to locate and interview them, thereby strengthening the allegations already developed. The information gathered from putative aggrieved employees and I refined my attorneys' understanding of the policies, practices, and procedures in place. This, in turn, informed my attorneys of the legal theories to further develop and emphasize at mediation. Even if a similar settlement had been reached down the line, it would have been undercut by the additional costs and expenses incurred.

8. During discovery, I spent several days looking through and collecting documents that would be responsive to the formal discovery requests. In fact, discovery was another essential component that contributed to the settlement process. The consultations with my attorneys assisted them with determining the relevant documents to request from Defendant and other sources (*e.g.*, personnel records, policy documents, job descriptions, sampling of time and pay records, etc.). By extension, obtaining an appropriate sampling of time and pay records allowed my attorneys to accurately calculate potential damages for mediation purposes, thereby giving them the leverage to reach a settlement. Furthermore, I prepared for and had my deposition taken in August 2021, which took up a significant amount of my time.

9. As for the settlement itself, I was available to answer any questions my attorneys had. During mediation, I made myself accessible all day via phone and Zoom to respond to any inquiries and provide my input on the negotiations. When my attorneys asked me to review the Settlement Agreement, I took about two (2) hours to review it. I then spent another hour asking questions and discussing the potential settlement with my attorneys before signing it.

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10. When I first became the named plaintiff, I understood that I was taking a risk that I may have difficulty finding employment in the future. This is especially true when compared to candidates who have not been a part of representative PAGA actions against their employers. Furthermore, as the named plaintiff, I was required to provide a full general release of all known or unknown claims and to expressly waive and relinquish the provisions, rights, and benefits, if any, of Civil Code section 1542. Thus, it was a serious risk being a part of a representative PAGA action, but I did not allow this to deter me from seeking justice.

11. I believe that I have done everything my attorneys have asked of me and have tried to represent the Aggrieved Employees on behalf of the State of California to the best of my abilities. In fact, I think that my efforts helped to get the result obtained herein. As the named plaintiff, I request that the Court to award me the PAGA Representative Service Payment of \$5,000 for my active participation and risks and sacrifices incurred.

12. Serving as the named plaintiff is not something that I took lightly. Considering the time dedicated to this matter, benefits conferred to the Aggrieved Employees, risking a judgment entered against me for attorneys' fees and costs, and losing a potential source of income, I believe that the PAGA Representative Service Payment is reasonable and justified.

13. I am not related to anyone associated with Justice Law Corporation.

I declare that under the penalty of perjury under the laws of California the foregoing is true and correct. Executed this 03/17/2025 at San Diego, California.

[Signature]

Alyssa Webb-Bruner