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Attorneys for Plaintiff

**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 TAMIKO BROOKS
IN SUPPORT OF APPROVAL OF PAGA
SETTLEMENT**

RESERVATION ID 600106760667

Date: July 8, 2025
Time: 8:30 a.m.
Dept.: 19

Action Filed: February 22, 2021
Trial Date: None Set

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I, Tamiko Brooks, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter. Declaration is submitted in support of approval of the proposed class action settlement (Settlement”) reached in this case. I have personal knowledge of the facts stated in this Declaration and could testify competently to them if called upon to do so.

2. I worked for Home Care Assistance of California, LLC (“Home Care”) as an in-home caregiver off and on beginning in 2016 and ending in February 2020. My job duties included monitoring and assisting elderly and disabled individuals with activities of daily living including preparing meals, doing laundry, feeding, bathing, dressing, and running errands.

3. Because each of my shifts took place at the individual client's home, Home Care did not record my time using a phone app or by calling into an automated system using my cell phone. Home Care did not reimburse me for any cost of my cell phone during my employment. Also, it is my understanding is that I was not paid for all the hours I actually worked. Home Care rounded my time entries using these timekeeping systems. Since I was responsible for the safety and wellbeing of the individual I was supervising while on duty, I rarely took a duty free meal or rest period throughout my shift. Instead I was expected to take short breaks while maintaining supervision so that I could be available in case I was needed immediately.

4. I brought this lawsuit against Home Care because I wanted the company to comply with the law and treat its employees fairly. I believe that I have taken on a greater burden than the other employees because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. I was willing to attach my name to the lawsuit, even though I understood it would be a public record, because I felt that someone needed to stand up for the company and I was willing to take on that burden for the benefit of my fellow co-workers.

5. I have been an active participant in this case ever since first consulting with my attorneys over four years ago. In addition to meeting with my attorneys and providing documents and information needed to initiate the case, I also regularly spoke with my attorneys to better

1 explain Home Care's policies and practices with them. I also prepared for and sat for a full day
2 deposition at my attorney's office in El Segundo, California. I also made myself available the
3 entire day of mediation. Overall, I estimate that I have spent at least 25 or more total hours on
4 activities leading to the resolution of this matter

5 I declare under penalty of perjury under the laws of the state of California and the United
6 States that the foregoing is true and correct. Executed on January 09, 2025, in Los Angeles,
7 California.

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Tamiko Brooks (Jan 9, 2025 10:01 PST)

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