

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Helene Mayer (SBN 332975)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

FEMI JORDAN, DEJEINER KING,
individually, and on behalf of other
members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California
Private Attorneys General Act;

Plaintiffs,

vs.

LARKIN STREET YOUTH SERVICES, a
California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No. CGC-21-589670

Honorable Richard B. Ulmer Jr.
Department 302

CLASS ACTION

**DECLARATION OF PLAINTIFF FEMI
JORDAN IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT AND
RELEASE**

Date: March 5, 2025

Time: 9:00 a.m.

Department: 302

Complaint Filed: February 19, 2021

Trial Date: None Set

DECLARATION OF FEMI JORDAN

I, **Femi Jordan**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff in the above-captioned case and the named plaintiff for a PAGA representative action in San Francisco County Superior Court, Case No. CGC-21-589915. These Actions are related to the class and PAGA representative action filed by Plaintiff Dejeiner King in San Francisco County Superior Court, Case No. CGC-21-592514. 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 Larkin Street Youth Services (“Defendant”) from approximately April 2018 to present as an hourly-paid, non-exempt Residential Counselor. I decided to seek legal advice about my work experiences with Defendant 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 Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing 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 a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the cases, I have spent time speaking with my attorneys regarding the cases and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout this matter, I was available to answer any questions my attorneys had,

1 and I was available to speak and meet with my attorneys whenever they needed me. I responded
2 to them as quickly as possible and gave them as much information and identified as many
3 documents as I could. I spent time speaking with my attorneys about the cases, identifying potential
4 witnesses, providing my attorneys with documents and information concerning the cases, and also
5 describing policies, practices, and procedures of Defendant.

6 5. As far as the settlement is concerned, I was available to review documents and
7 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
8 Settlement Agreement and discussed the questions I had regarding the potential settlement with
9 my attorneys before signing the settlement papers.

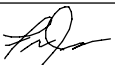
10 6. I think my efforts helped to get the result obtained in this matter, and as a potential
11 class and PAGA representative, I respectfully request that the Court award me an enhancement
12 award for my efforts in pursuing and participating in this matter, as well as my broader release of
13 claims. Taking into consideration the time that I have dedicated to this matter, I believe that this
14 amount is reasonable.

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

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
18 the Court awards as an enhancement award, as well as my share of the settlement as a class member
19 and aggrieved employee.

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

22 Executed this 19th day of December 2024, at Oakland, California

23 Electronically Signed  2024-12-19 22:36:01 UTC - 73.15.153.142
Intex AssureSign® d27cb974-c813-4907-ab88-b24b0113ee5a

24 Femi Jordan