

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Peter J. Carlson, Esq. [CSB No. 295611]
peter@lmlfirm.com
LAUBY, MANKIN & LAUBY LLP
4590 Allstate Drive
Riverside, CA 92501
T: (951) 320-1444
F: (951) 320-1445

Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

CHANDRA FINGER, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

PROFESSIONAL REGISTRY HOLDINGS,
LLC, a California Limited Liability
Company; COACHELLA VALLEY
HEALTH PERSONNEL, an Entity
Unknown; KEVIN BASS, an Individual;
GEORGE TUCKER, an Individual, KIRVIN
SATTERWHITE, an Individual; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CVRI2101956
*[Assigned to the Hon. Judge Sunshine Sykes,
Dept 6, for all purposes]*

DECLARATION OF DARREN DANIELS

Hearing

Date: January 12, 2022
Time: 8:30 a.m.
Dept. 6

Reservation #: 379229112332

Complaint filed: 4/23/21
FAC filed: 6/15/21
SAC filed: 8/6/21

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I, Darren D. Daniels, declare as follows:

1. I am an attorney at the Law Offices of Darren D. Daniels, counsel of record for Professional Registry Holdings, LLC (“PRH”), Kevin Bass, George Tucker, and Kirvin Satterwhite (hereinafter referred to collectively as “Defendants”) in the above-captioned action. I am a member of good standing of the State Bar of California. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I give this declaration with respect to Chandra Finger v. Professional Registry Holdings, LLC, et al. - CIVRI2101956 (the “Finger Case”). In particular this declaration is in support of the parties’ settlement of the Finger Case and in connection with the Court’s Class Action Case Management Order’s requirements for the Motion for Preliminary Approval of the settlement. The motion is currently scheduled for hearing on January 12, 2022.

3. A subsequent, and completely separate, wage and hour class action lawsuit was filed against PRH and its dbas in San Diego Superior Court on August 3, 2021 by three named plaintiffs. This lawsuit is titled Alba Calderon, et al. v. Professional Registry Holdings, LLC and the case number is 37-2021-00033063-CU-OE-CTL (hereinafter the “San Diego Case”)

4. The San Diego case contains class allegations against PRH for various wage and hour violations under California law and it also has individual Fair Employment and Housing Act (FEHA) claims on behalf of two of the three named plaintiffs for discrimination and retaliation.

5. The class claims in the San Diego case are all subsumed by the Finger Case and the class definition also seeks to represent the same workers. The class definition in the San Diego case is: “All persons working in California who have worked for [PRH and its dbas] that provided

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household occupation services to [PRH's] clients....”

6. The wage and hour claims in the San Diego Case are as follows: Inaccurate Wage Statements, Failure to Pay Meal Period Premium Pay, Failure to Pay Rest Break Premium Pay, Violation of California's Unfair Competition Law, and Declaratory Relief.

7. Like the Finger Case, the gravamen of the San Diego Case is that PRH allegedly misclassified the putative class members as independent contractors. All of the substantive claims in the San Diego Case on a class wide basis are contained in the Finger Case with the exception of Declaratory Relief. However, that claim is entirely based on the same allegation in the Finger Case that PRH misclassified the putative class members as independent contractors. The Finger Case contains class claims which are not pled in the San Diego Case. These include a cause of action for unpaid overtime and several causes of action for violations under the Private Attorneys General Act.

8. The FEHA claims are pled as individual claims in the San Diego Case and they have no overlap with the Finger Case other than PRH being a defendant.

9. The attorneys for the putative class in the San Diego Case are expressly aware of the Finger Case, the fact that the parties settled it, and are undertaking the court approval process. I have had many communications with the attorneys in the San Diego Case about the Finger Case and the fact that all claims in the San Diego Case are subsumed by the Finger Case. Such conversations have taken place over the phone and via email. I have also shared the operative complaint in the Finger case with the attorneys in the San Diego Case. The attorneys in the San Diego Case have been made expressly aware by me that the Finger Case recently settled and that the Motion for Preliminary Approval in the Finger Case is set for hearing on January 12, 2022.

10. I am currently working with the attorneys in the San Diego case in an attempt to settle the FEHA claims and potentially the wage and hour claims on an individual basis due to the

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1 proposed settlement in the Finger Case. I have communicated my position that this court's approval
2 of the class wide settlement in the Finger Case would effectively bar the further prosecution of a
3 class action in the San Diego Case because the cases seek to represent the same workers, for
4 effectively the same claims with the slight differences described above. The attorneys in the San
5 Diego case have not commented yet about whether they intend to object to the proposed settlement
6 in the Finger Case, have their clients opt out and pursue individual wage and hour claims in the San
7 Diego Case, or just participate in the settlement in the Finger Case without objection pending the
8 court's approval.
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11 11. The San Diego Case is at issue. PRH has filed its answer and the court has scheduled
12 a Case Management Conference for January 21, 2022. To date, no discovery has been done on the
13 San Diego case as the parties are currently attempting to settle it.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing
15 is true and correct.
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17 Executed on December 16, 2021 in Long Beach, California.

18 *Darren Daniels*

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20 Darren D. Daniels
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28 DECLARATION OF DARREN D. DANIELS