

Joanna Ghosh (SBN 272479)
Vartan Madoyan (SBN 279015)
Matthew Richard Soto (353499)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021
Attorneys for Plaintiffs Lorena Bellamy,
Orishia Blacksher, Harold Brissett, and the Class

James R. Hawkins (SBN 192925)
Gregory Mauro (SBN 222239)
JAMES HAWKINS, APLC
9880 Research Drive, Suite 200
Irvine, California 92618
Tel: (949) 387-7200 / Fax: (949) 387-6676

Attorneys for Plaintiff Deanna Lynette Davis and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

LORENA BELLAMY, individually, and on
behalf of other members of the general public
similarly situated; and ORISHIA
BLACKSHER and HAROLD BRISSETT,
individually, and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiffs,

vs.

LIFELONG MEDICAL CARE, a California
corporation; and DOES 1 through 100, inclusive

Defendants.

Case Nos.: HG19024178 (Lead Case)
Consolidated Case Nos.: 21CV004212 &
22CV012004

Honorable Somnath Raj Chatterjee
Department 21

CLASS ACTION

**DECLARATION OF ORISHIA
BLACKSHER IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Reservation ID: 126656572735
Date: March 24, 2025
Time: 1:30 p.m.
Department: 21

Complaint Filed: June 24, 2019
FAC Filed: January 12, 2022
Trial Date: None Set

DEANNA LYNETTE DAVIS, individually
and on behalf of all others similarly situated;

Plaintiff,

v.

LIFELONG MEDICAL CARE, a California
Corporation; and DOES 1-50, inclusive,

Defendants

DEANNA LYNETTE DAVIS, individually
and on behalf of other aggrieved employees
pursuant to the California Private Attorney's
General Act;

Plaintiff,

v.

LIFELONG MEDICAL CARE, a California
Corporation; and DOES 1-50, inclusive,

Defendants

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

17
18
19
20
21
22
23
24
25
26
27
28

24
25
26
27
28

concerning the case, and also describing policies, practices, and procedures of Defendant.

5. On January 12, 2022, I attended a deposition that lasted approximately 3 hours. I spent at least 5 hours preparing for the deposition. After the deposition, I spent at least 3 hours reviewing my testimony and discussing the contents of the deposition transcript with my attorneys.

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

7. 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 and other aggrieved employees. I think my efforts helped to get the result obtained in this case, and as a PAGA representative, I respectfully request that the Court award me an enhancement payment in the amount of \$10,000.00 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.

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

9. 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 payment, as well as my share of the settlement as a class member and an aggrieved employee.

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

Executed this ^{05/31/2024} ____ day of May 2024, at Berkeley, California

Electronically Signed: 2024-06-02 03:11:33 UTC - 24.6.2.240
Orishia Blacksher
Hinterx AssureSign® 9a5da603-9c42-4281-a144-b1810110976a

Orishia Blacksher