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**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 HAROLD BRISSETT
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

DECLARATION OF HAROLD BRISSETT

I, **Harold Brissett**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. 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 Lifelong Medical Care (“Defendant”) from approximately April 2011 to approximately August 2021 as an hourly-paid, non-exempt employee. In or around April 2021, 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 its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 9 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 12 hours discussing my situation, representative action lawsuits under the Private Attorney general Act (“PAGA”), and what it meant to bring a PAGA Action.

3. I have spent over 21 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a 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 hourly-paid or 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. As the case progressed, I was available to answer any questions my attorneys had and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least 17 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information

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

5. 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 3 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement-related paperwork.

6. 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 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.

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

8. 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.

05/31/2024

Executed this ____ day of May 2024, at Vallejo, California

Electronically Signed 2024-05-31 19:10:09 UTC - 107.127.14.137
Nintex AssureSign® 64cb3116-5caa-496f-82c7-b18101105478

Harold Brissett