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12 Attorneys for Plaintiffs MELODY DANIEL-
13 COLLIER and JUDITH A DAVIS,

14 individually and on behalf of all others similarly situated

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

MELODY DANIEL-
COLLIER and JUDITH A DAVIS,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

GEO REENTRY SERVICES LLC, a Florida
limited liability company; THE GEO GROUP,
INC., dba GEO CALIFORNIA, INC., a
Florida corporation, and DOES 1-50,
inclusive,

Defendants.

Case No. CGC-21-595010
Assigned for All Purposes to:
Hon. Ethan P. Shulman, Dept. 304

**DECLARATION OF JUDITH A DAVIS IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 30, 2023
Time: 10:00 a.m.
Dept.: 304

DECLARATION OF JUDITH A DAVIS

I, JUDITH A DAVIS hereby declare as follows:

1. I am over the age of eighteen and I submit this Declaration in support of the motion for preliminary approval of the settlement and fees, costs and incentive. The following is based upon my personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendants GEO REENTRY SERVICES LLC and THE GEO GROUP INC dba GEO CALIFORNIA, INC. ("Defendants") in approximately 2016 as a Non-Exempt Employee working as an Addiction Counselor and worked during the liability period for Defendants until my separation from Defendants' employ in approximately November 2021. I typically worked 5 days a week and 40 or more hours per week.

3. As a non-exempt employee, I suffered the same damages as other employees. These included not being paid all my wages, not provided meal periods or permitted rest periods, not reimbursed for business expenses incurred, not timely paid wages upon my separation from Defendants' employ, not provided accurate itemized wage statements, as well as violations under the UCL all in accordance with California law. As a result of these alleged violations, I sought consultation with my attorneys at James Hawkins, APLC.

4. Based upon my allegations, and after consultation and full disclosure from my attorneys about the potential risks I faced as a Plaintiff in a putative class action, I freely decided to pursue this lawsuit to try and vindicate my rights and the rights of others who also worked for Defendants and suffered similar harms due to Defendants' common practices and policies.

5. Prior to filing my action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendant. During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

6. My attorneys provided me with a draft of the complaint for my review and

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2 approval. I closely reviewed the complaint to ensure accuracy and completeness. As a
3 result, I caused my attorneys to file the class action complaint alleging claims for the allegations
4 alleged therein. Thereafter, I have been fully involved in my case. Following the filing of the
5 complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly
6 contacted my attorneys to stay current on the status of the litigation, and to discuss my
7 attorneys' progress in prosecuting the claims.

8 7. Since I believe I was not accurately paid all my wages, not provided meal periods
9 or permitted rest periods, not provided accurate wage statements, not reimbursed for business
10 expenses incurred, not timely paid wages upon my separation from Defendants' employ, not
11 provided accurate itemized wage statements, and suffered violations under the UCL, I believe
12 that I have been similarly injured as to all other class members in the settlement who worked
13 for Defendants during the class period. I believe the claims asserted in the Complaint is also
14 shared by the other Class Members. I worked with various other non-exempt employees and I
15 believe we were all treated the same and subject to the same unlawful policies.

16 8. Since I agreed to become a Class Representative, I have worked every step
17 of the way with my attorneys. During the course of the litigation I have always kept the best
18 interest of the Class Members on equal footing as mine. I have been, and I am willing to
19 continue to pursue the Class Members' claims vigorously on our collective behalf if the
20 Settlement is not finally approved. As a result, I firmly believe that I do not have any interests
21 adverse to the interests of the Class Members. I have maintained the Class Members best
22 interest from the inception of the case.

23 9. As one of the Class Representatives, I have spent numerous hours consulting
24 with my attorneys, providing documentation, consulting with other Class Members, responding
25 to questions by my attorneys, preparing for my deposition, although my deposition was not
26 taken, providing documents to my attorneys, working with my attorneys to review documents
27 received, helping my attorneys in preparing for the mediation and attending the mediation via
28 telephone. I was consulted about the status of the case and provided constant feedback about
the case from my attorneys including the mediation, settlement negotiations and eventual

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2 settlement. I estimate I have spent approximately 45 hours working on this case.

3 10. From the beginning of this case, I have freely chosen to accept the risks of
4 being one of the Class Representatives in this class action lawsuit. I chose to assume these risks
5 and pursue the claims on behalf of the Class Members as I wanted to vindicate their rights. I
6 believe we have achieved that result with the settlement and the individual payments to the
7 Class Members. I believe the settlement is fair reasonable and adequate based on the numerous
8 defenses asserted by Defendants. I believe the efforts and work I put forth helped to achieve the
9 fair settlement that will benefit the Class Members. As a result of my efforts, I also believe the
10 Class Representative Incentive Award is reasonable, and I respectfully request the Court
11 approve the amount of \$7,500.00 as fair and reasonable.

12 I declare under penalty of perjury under the laws of the state of California that the
13 foregoing is true and correct. Executed on April 13, 2023, at Long Beach, California.

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DocuSigned by:
Judith Davis
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JUDITH A DAVIS