

B. James Fitzpatrick (SBN: 129056)
 Laura L. Franklin (SBN: 282642)
 FITZPATRICK & SWANSTON
 555 S. Main Street
 Salinas, CA 93901
 Telephone: (831) 755-1311
 Facsimile: (831) 755-1319

Larry W. Lee (SBN: 228175)
 DIVERSITY LAW GROUP, P.C.
 515 South Figueroa Street, Suite 1250
 Los Angeles, CA 90071
 Telephone: (213) 488-6555
 Facsimile (213) 488-6554

Attorneys for Plaintiff,
 HEA YON SUZZIE DORN, on behalf of herself and all other similarly situated employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

HEA YON SUZZIE DORN, on behalf of
 herself and all similarly aggrieved
 employees,

Plaintiff,

v.

CENTRAL COAST FEDERAL CREDIT
 UNION; and DOES 1 through 50, inclusive,

Defendants.

Case No. 22CV000335

(Assigned to the Honorable Thomas W. Wills,
 Dept. 15)

**DECLARATION OF HEA YON SUZZIE
 DORN IN SUPPORT OF PLAINTIFF'S
 MOTION FOR PRELIMINARY
 APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: June 30, 2023

Time: 9:00 a.m.

Dept.: 15

Complaint Filed: February 3, 2022

Trial Date: Not Set

DECLARATION OF HEA YON SUZZIE DORN

I, Hea Yon Suzzie Dorn, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Defendant Central Coast Federal Credit Union ("Defendant") as a non-exempt employee from about June 6, 2005, until about January 7, 2022.

3. During my employment, I regularly worked shifts of 5 hours or more without being provided an off-duty, uninterrupted meal break of 30 minutes. I also regularly worked shifts of about 4 hours without being provided an off-duty, uninterrupted rest break of about 10 minutes. I did not receive compensation in lieu of these missed or interrupted breaks.

4. As part of my compensation, I regularly received non-discretionary incentive payments. However, these incentive payments were not factored into the regular rate of pay during periods when I received overtime wages or sick pay. As such, I believe I am owed additional overtime and sick pay. These wages were not paid to me at the time or earning or upon my separation of employment.

5. In addition, during my employment I was regularly required to use my personal cell phone for work purposes. I was not reimbursed for the costs of using my cell phone.

6. As a result of the above, I understand that the wage statements I received were incorrect.

7. I understand that this action was brought on behalf of all other non-exempt hourly employees in the State of California, and I am acting as a representative for the Class. As class representative, I understand that it is my responsibility to act in the best interest of the Class and not my own. I agree that I will not put my own interests ahead of that of the Class, and that I will not settle out my claims separately or independently from the Class. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

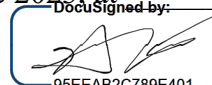
4. I have and continue to be willing to assist in the investigation of this matter,

1 including providing any necessary information and documents, as well as make myself
2 available for trial or any further proceeding in this matter as required to represent the interests
3 of the Class. I also understand my duties and responsibilities to the proposed class and will
4 carry out those duties as necessary.

5 5. I have discussed the terms of the settlement with my attorneys, and based on the
6 information provided, I believe the settlement to be fair, adequate, and reasonable for myself
7 and for the entire Class.

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

10 Executed on this ____ day of June 2023, at _____, California.

11 
12 _____
13 DocuSigned by:
14 95EEAB2C789E401
15 Hea Yon Suzzie Dorn
16
17
18
19
20
21
22
23
24
25
26
27
28