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Attorneys for Plaintiff and the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

TIKOA CARTER, an individual, on behalf of
herself and others similarly situated

PLAINTIFF,

v.

SPEECH AND LANGUAGE PATHOLOGY
ASSOCIATES, INC.; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

CASE NO. 21STCV44618

[Case Assigned for All Purposes to Hon.
Kenneth R. Freeman in Dept. 14]

**DECLARATION OF TIKOA CARTER IN
SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: April 30, 2024

Time: 11:00 A.M.

Dept: 14

Complaint Filed: December 8, 2021

FAC Filed: May 19, 2022

Trial Date: None Set

DECLARATION OF TIKOA CARTER

I, TIKOA CARTER, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant SPEECH AND LANGUAGE PATHOLOGY ASSOCIATES, INC. ("Speech and Language" or "Defendant") as an hourly employee. I worked as a speech language therapist and generally worked in client's homes.

3. I brought this Action, on behalf of myself and all other Class Members, against Defendant because I believe that Speech and Language did not provide lawful rest periods, reimburse for necessary business-related expenses, provide accurate itemized wage statements, and provide wages owed at time of separation to me and other employees.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched experienced attorneys who are very experienced with these types of employment actions. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this Action. The Action was filed on December 8, 2021.

6. Throughout the litigation, I have provided my attorneys with documents and helpful information to litigate this case as needed. Additional work in connection with this matter includes staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys' various communications regarding this matter, attending a full-day mediation on June 28, 2022 on Zoom, and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

7. I estimate the total time spent in connection with this matter is approximately 30-40 hours.

1 8. I have worked to actively represent the other Class Members and their interests and
2 I have always kept the Class Members interests at heart in this litigation. I am prepared to continue
3 assisting with this litigation as needed and am committed to achieving the best possible results for
4 the Class.

5 9. I believe that the class action settlement obtained on behalf of the Class is fair and
6 reasonable in light of the issues involved in this case. As mentioned above, I attended the
7 mediation on Zoom and reviewed and discussed the Agreement with my attorneys and asked them
8 questions about it to ensure that I understood its terms and what it would mean for all of the class
9 members.

10 10. I believe that I have fairly represented the absent Class and request that the Court
11 finally approve this settlement and confirm me as Class Representative.

12 11. I am not aware of any conflicts of interest that prevent me from being confirmed as
13 Class Representative in this Action. I am not related in any way to my attorneys or to any other
14 member of the firm that is representing me. I have no business dealings or other involvement
15 beyond this Action and this representation. I have not been promised any money or inducement
16 to serve as Class Representative in this Action.

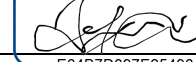
17 12. It is my opinion that the settlement agreement provides for a fair and adequate
18 enhancement for me as a Class Representative, in the amount of \$5,000. I believe that this is fair
19 and reasonable in light of all of the work that I have performed in my role as Class Representative.
20 As Class Representative, I have actively participated in all stages of the litigation, as detailed
21 above, and have always maintained the best interests of the Class while performing my Class
22 Representative duties.

23 13. It is also my opinion that the Class Representative enhancement is fair, reasonable,
24 and adequate because, in addition to the many hours spent participating in the prosecution of this
25 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
26 were unsuccessful in this Action. Likewise, I risk the potential stigma of being a Class
27 Representative in a class action labor dispute, which may affect my future employability.
28

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

3 Executed this 16 day of March, 2023 at March, California.

4 DocuSigned by:

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6 TIKOA CARTER
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(PROOF OF SERVICE)

[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On March 29 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF TIKOA CARTER IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

O'HAGAN MEYER LLP

Katherine C. Den Bleyker

kdenbleyker@ohaganmeyer.com

550 S. Hope Street, Suite 2400

Los Angeles, CA 90071

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL THROUGH CASE ANYWHERE: On interested parties set forth on the attached service list.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 29, 2024, at Woodland Hills, California.



Michelle Tanzer