

FILED

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

ELEXIS SNELL, individually, on behalf of all
others similarly situated, and on behalf of the
State of California and other aggrieved
persons,

Plaintiff,

v.

SHASTA COMMUNITY HEALTH CENTER, a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. CVCV22-199416

CLASS & REPRESENTATIVE ACTION

*[Assigned for all purposes to Hon. Tamara L.
Wood, Dept. 8]*

**DECLARATION OF ELEXIS SNELL IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

WILSHIRE LAW FIRM, PLC
3055 Wilshire Blvd, 12th Floor
Los Angeles, CA 90010-1137

BY FAX

DECLARATION OF ELEXIS SNELL

I, Elexis Snell, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Defendant Shasta Community Health Center ("SCHC"). I worked at SCHC from approximately March 2020 to approximately May 2021 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of SCHC's policies and practices that have been alleged as unlawful in the Complaint.

4. I am the plaintiff in this action and have actively participated in this matter since before it was filed. Prior to filing this case, I provided Wilshire Law Firm and my attorneys a detailed account of the facts related to my employment with SCHC, including SCHC's policy and practice of not providing its employees with California compliant meal and rest periods and requiring its employees to work "off-the-clock" during meal periods and after clocking out for the workday. Additionally, I provided my counsel with documentation in the form of wage statements and employment records in support of the claims. These documents, along with the anecdotes I shared regarding my employment, assisted my attorneys in understanding the illegal policies and practices at SCHC. I also regularly communicated with my attorneys and staff members of Wilshire Law Firm.

5. My attorneys explained to me the risks and benefits of bringing forward a class action matter. I understood the risks, both professionally and financially, associated with pursuing a class action case and acting as the Class Representative. I further understood that pursuing the case as a class action rather than individually meant that it would take substantially longer as a

1 result of the multi-step approval process. Although I was made aware that there was a possibility
2 that I could receive nothing at the end, I believed that it was important to ensure that SCHC
3 followed the law with respect to all of its hourly-paid, non-exempt employees.

4 6. Since this case was filed, I have had financial constraints and medical expenses that
5 I needed to cover. Even though I could have potentially pursued faster recovery on an individual
6 basis, I chose to pursue the claims through this class action to benefit other members of the class.
7 I am relieved this case is coming to an end so that other employees and I can be compensated.

8 7. By initiating this lawsuit, I also hoped that I might be able to change SCHC's
9 policies to better protect the working conditions of my co-workers and provide monetary relief to
10 SCHC's hourly-paid and non-exempt employees. Additionally, I understood that it was my
11 responsibility to act in the best interests of the Class and not just myself. In that respect, I
12 understood my duties and responsibilities to the proposed Class and carried out and will continue
13 to carry out those duties as necessary.

14 8. Throughout the course of the litigation, I maintained constant communication with
15 my attorneys and discussed important matters relevant to the lawsuit. I asked questions when I
16 wanted to know what was being done to advance the interests of the Class or simply wanted an
17 update regarding the case. I understood that a recovery would not only benefit me but would
18 benefit my fellow coworkers as well. At all times, I made myself available to answer any questions
19 that my attorneys had about my employment.

20 9. As a class representative, I performed a number of tasks, including speaking with
21 my counsel to discuss facts about the case, speaking with other class members regarding the case,
22 reviewing pleadings before filing with the court, assisting with mediation preparation, and being
23 in regular contact with my counsel regarding the status of my lawsuit and providing my counsel
24 with any information or documents upon request.

25 10. I estimate that I spent **at least 50 hours** searching for and collecting documents
26 related to my employment, speaking with my attorneys throughout the litigation, speaking with
27 other class members about the case, helping my attorneys prepare for mediation, discussing the
28 particulars and reasonableness of the settlement, and reviewing/signing documents related to the

1 settlement.

2 11. I have reviewed the Stipulation and Settlement of Class Action and Private
3 Attorneys General Act Representative Claims ("Settlement Agreement") in full and discussed all
4 the terms with my attorneys. My attorneys answered all the questions I had regarding the
5 Settlement Agreement. I believe the settlement terms and allocations are fair, adequate, and
6 reasonable given the strength of the class claims and SCHC's defenses.

7 12. I understand the proposed settlement allows me to be awarded a Class
8 Representative Service Payment of \$10,000, which I am seeking for all the work and efforts in this
9 case, for undertaking the financial risk and potential publicity of pursuing this case, and for my
10 general release of claims that I have against SCHC. As the plaintiff in this case, I have expended
11 a lot of time and energy into this case and I respectfully request that the Court award me the service
12 payment in full. I carried out these responsibilities I am receiving no additional compensation
13 other than the compensation provided for in the settlement. I also have signed a general release,
14 which does not apply to other employees. Meanwhile, I continue to fear that any employer may
15 find out that I participated in this lawsuit and hold it against me, especially considering that my
16 name is associated with this lawsuit. In a competitive job market, this factor may weigh heavily
17 against me. Nonetheless, I felt that important rights were at stake that hurt myself and other
18 employees so I am happy and hopeful that this case will be resolved soon.

19 I declare under penalty of perjury, under the laws of the State of California and the United
20 States of America, that the foregoing is true and correct.

21 Executed on 10/18/2024 at Redding, California.

22 DocuSigned by:

23 *Elexis Snell*

24 0CE25893A094458

25 ELEXIS SNELL

PROOF OF SERVICE

Snell v. Shasta Community Health Center, et al.
CVCV22-0199416

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Rebecca Padilla, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12th Floor, Los Angeles, California 90010. My electronic service address is rebecca.padilla@wilshirelawfirm.com.

On October 18, 2024, I served the foregoing **DECLARATION OF ELEXIS SNELL IN SUPPORT OF PLAINTIFF'S MOTIO FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

Mark Posard (SBN 208790)
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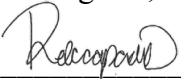
Attorneys for Defendant

(X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site.

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

Executed on October 18, 2024, at Los Angeles, California.



Rebecca Padilla