

DANIEL F. GAINES, ESQ. SBN 251488
daniel@gaineslawfirm.com
GAINES & GAINES, APLC
4550 East Thousand Oaks Boulevard, Suite 100
Westlake Village, CA 91362
Telephone: (818) 703-8985
Facsimile: (818) 703-8984

Attorneys for Plaintiff Nakeitha Kennedy, on behalf of herself and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

NAKEITHA KENNEDY, on behalf of herself
and all “aggrieved employees” pursuant to
Labor Code § 2698 *et seq.*,

Plaintiff,

v.

NORTHRIDGE COOPERATIVE HOMES, a
California nonprofit corporation, and DOES 1
through 10, inclusive,

Defendants.

CASE NO: 22CV014162

Assigned to Hon. Jenna Whitman, Dept. 25

**DECLARATION OF NAKEITHA
KENNEDY IN SUPPORT OF
UNOPPOSED MOTION FOR AN
ORDER APPROVING SETTLEMENT
OF CLAIMS BROUGHT PURSUANT
TO THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004, AWARDED
ATTORNEYS’ FEES, COSTS, AND
REIMBURSEMENT OF SETTLEMENT
ADMINISTRATION EXPENSES, AND
DISMISSING ACTION WITH
PREJUDICE**

Date: May 22, 2025

Time: 3:00 p.m.

Dept.: 25

Reservation ID: 206886742829

Complaint Filed: July 13, 2022

1 I, NAKEITHA KENNEDY, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit against Defendants Northridge
3 Cooperative Homes ("Northridge") and Alton Management Corporation ("Alton")
4 (Northridge and Alton are collectively referred to as "Defendants") and I submit this
5 declaration in support of Plaintiff's Unopposed Motion For An Order Approving
6 Settlement Of Claims Brought Pursuant To The Private Attorneys General Act Of 2004,
7 Awarding Attorneys' Fees, Costs, And Reimbursement Of Settlement Administration
8 Expenses, And Dismissing Action with Prejudice. I am a competent adult and worked for
9 Defendants as a non-exempt employee from approximately June 2018 through July 21,
10 2021. I have personal knowledge of the facts set forth herein, and if called as a witness
11 to testify to them, I could and would do so competently.

12 2. I contacted my current attorneys when I questioned the employment
13 practices of Defendants prior to commencing this lawsuit. I accepted the opportunity to
14 act as a representative on behalf of other employees of Defendants in this action whom I
15 believed were being subjected to labor law violations. I pursued this case on a
16 representative basis so that I could help other employees recover for what I believed were
17 Defendants' improper practices.

18 3. Specifically, I questioned Defendants' policies of failing to pay all wages
19 due, to provide legally compliant rest and meal periods, or compensation in lieu thereof,
20 to reimburse for all business expenses incurred, to issue accurately itemized wage
21 statements, and to timely pay all wages due at the separation of employment. Through
22 many discussions with my lawyers, I learned these may be illegal practices and
23 Defendants' employees might have recourse for them.

24 4. By bringing this lawsuit, and throughout its course, I have put the interests
25 of other employees ahead of my own. I understood that I could possibly earn an incentive
26 award if this case resolved itself favorably, but I also knew that I could also be responsible
27 for paying Defendants' attorneys' fees and costs if it did not.
28

1 5. My goal in bringing this lawsuit was to obtain a recovery on behalf of all
2 employees of Defendants, and even more importantly, to put an end to what I believed
3 were illegal practices on the part of Defendants. I believe I have achieved both through
4 this lawsuit and settlement.

5 6. I am very happy about the results of this litigation. I am satisfied that
6 Defendants are compensating other Aggrieved Employees and the State for penalties that
7 I believe we are due.

8 7. At the onset of this case, I spent time through numerous phone calls with
9 several of my attorneys explaining what I understood to be Defendants' policies and
10 practices and how they were applied to other employees. I kept actively involved with the
11 status of this case throughout the litigation process, tracking the status of the case and
12 participating as much as possible.

13 8. While I have not maintained detailed time records of my activities in
14 connection with this litigation, I believe that I have spent a total of approximately 25 hours
15 assisting my attorneys with the preparation of this case and doing work and investigation
16 of the facts independent from my attorneys both before and during this case. I helped my
17 attorneys prepare for the mediation.

18 9. Before this litigation commenced, and throughout its course, I spent
19 approximately 3-4 hours gathering, organizing, and reviewing documents and information
20 for this lawsuit. I sifted through many of my own documents and reviewed information
21 produced by Defendants as part of this litigation.

22 10. I communicated with my attorneys several times per month to track my
23 case's status. I have taken an active involvement in this matter throughout its course.

24 11. Taking the initiative with this case was very risky for me, both
25 professionally and financially. I put principal first and took a tremendous risk by filing
26 this lawsuit. I am quite confident that pursuing this lawsuit will result in future
27 reputational harm to me. There is a stigma associated with suing one's former employer.
28

1 I suspect I may be adversely affected when it comes to obtaining future employment –
2 employers who discover that I sued Defendants in a representative action will likely avoid
3 hiring me.

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

6 Executed on 04 / 28 / 2025 at North Las Vegas, Nevada.

7
8 
9 _____
10 NAKEITHA KENNEDY
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28