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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

KAYLYNN PARKER, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act,

Plaintiff,

vs.

GOLDEN STATE DERMATOLOGY, INC.,
an unknown business entity; GOLDEN STATE
DERMATOLOGY MANAGEMENT, LLC, an
unknown business entity; and DOES 1 through
100, inclusive,

Defendants.

Case No. MSC21-00576

Honorable Charles S. Treat
Department 12

CLASS ACTION

**DECLARATION OF KAYLYNN
PARKER IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Yasmin Hosseini); and [Proposed]
Order filed concurrently herewith]

Date: _____
Time: _____
Department: 12

Complaint Filed: March 3, 2021
FAC Filed: August 4, 2021
SAC Filed: November 18, 2021
Trial Date: None Set

DECLARATION OF KAYLYNN PARKER

I, **Kaylynn Parker**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Golden State Dermatology, Inc., and Golden State Dermatology Management, LLC (together, “Defendants”) in an hourly-paid, non-exempt position from approximately July 2019 to approximately October 2019. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not paying their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 4 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 5 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and eventually a PAGA representative.

3. I have spent over 19 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to

1 them as quickly as possible and gave them as much information and identified as many
2 documents as I could. I spent at least 11 additional hours speaking with my attorneys about the
3 case, identifying potential witnesses, providing my attorneys with documents and information
4 concerning the case, and also describing policies, practices, and procedures of Defendants.

5 5. As far as the settlement is concerned, I was available to review documents and
6 answer any questions my attorneys had. I spent about 4 hours reviewing the settlement
7 agreement and about 3 hours asking questions and discussing the potential settlement with my
8 attorneys before signing the settlement agreement.

9 6. I believe that I have done everything that my attorneys have asked of me and have
10 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
11 and the State of California. I think my efforts helped to get the result obtained in this case, and as
12 a class and PAGA representative, I respectfully request that the Court award me an enhancement
13 payment in the amount of \$7,500.00 for my active participation in this case. Taking into
14 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

15 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this case. The only compensation I will receive is whatever amount
18 the Court awards as an enhancement payment as well as my share of the settlement as a class
19 member and as an aggrieved employee.

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

22 Executed this ^{11/28/23} ____ day of November 2023, at El Sobrante, California

23 Electronically Signed
Kaylynn Parker
Nintex AssureSign® 2023-11-30 01:45:03 UTC - 107.115.29.85
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24 Kaylynn Parker