

1 John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
2 Diego Aviles (SBN 315533)
diego.aviles@wilshirelawfirm.com
3 Emily Borman (SBN 303180)
emily.borman@wilshirelawfirm.com
4 Harry Erganyan (SBN 333091)
harry.erganyan@wilshirelawfirm.com
5 Lisa B. Iturriaga (SBN 339678)
lisa.iturriaga@wilshirelawfirm.com
6 Miriam Nazaretyan (SBN 334154)
miriam.nazaretyan@wilshirelawfirm.com
7 **WILSHIRE LAW FIRM, PLC**
660 S. Figueroa St., Sky Lobby
8 Los Angeles, California 90017
Telephone: (213) 381-9988
9 Facsimile: (213) 381-9989

10 Attorneys for Plaintiff David Lockhart, individually,
11 and on behalf of all others similarly situated

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF SONOMA**

14 DAVID LOCKHART, individually, and on
15 behalf of all others similarly situated,

16 *Plaintiff,*

17 v.

18 HABITAT FOR HUMANITY OF SONOMA
COUNTY, a California corporation; HABITAT
19 FOR HUMANITY, INC., a Georgia
corporation, and DOES 1 through 10,
20 inclusive,

21 *Defendants.*

Case No.: SCV-273164

*Assigned for all purposes to:
Hon. Kenneth G. English
Courtroom 18*

**DECLARATION OF NICHOLE
WIMBISCUS IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

FINAL APPROVAL HEARING

Date: September 10, 2025

Time: 3:00 p.m.

Dept: 18

1 I, Nichole Wimbiscus, declare:

2 1. I am the Director of Operations for Defendant HABITAT FOR HUMANITY OF
3 SONOMA COUNTY. I have personal knowledge of, and would and could testify competently
4 to, the statements set forth herein.

5 2. I accessed Defendant's Human Resources records database and created a list of
6 all non-exempt employees reporting to 1201 Piner Road, Santa Rosa, CA 95403, employed
7 between the period from October 31, 2018, to January 22, 2024 (the "Class Period").

8 3. According to the report, there were a total of 44 non-exempt employees during
9 the Class Period.

10 4. According to the Class Administrator's calculation, the total number of
11 workweeks was 3,951.

12 5. The original estimate of the number of workweeks, based on my report, was
13 3,846, as was stated in the Settlement Agreement.

14 6. The final number of workweeks is 3% higher than the original estimate, which is
15 permissible under section 8 of the Settlement Agreement.

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct. Dated this 18th day of August 2025, at Santa Rosa, California.

18 Habitat for Humanity of Sonoma County

19
20 
21 Nichole Wimbiscus, Director of Operations
22
23
24
25
26
27
28