

Kane Moon (SBN 249834)
H. Scott Leviant (SBN 200834)
Mariam Ghazaryan (SBN 341119)
MOON LAW GROUP, PC
725 S. Figueroa St., 31st Floor
Los Angeles, California 90017
Telephone: (213) 232-3128
Facsimile: (213) 232-3125
E-mail: kmoon@moonlawgroup.com
E-mail: hsleviant@moonlawgroup.com
E-mail: mghazaryan@moonlawgroup.com

Attorneys for Plaintiff Riley J. Small

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Andrew J. Rowbotham (SBN 301367)
arowbotham@haineslawgroup.com
Susan J. Perez (SBN 329044)
sperez@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff Sharese Casey

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF KERN

RILEY J. SMALL, individually, and SHARESE
CASEY, individually, and on behalf of all others
similarly situated,

Plaintiffs,

vs.

RIDGECREST REGIONAL HOSPITAL, a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: BCV-23-102418

[Assigned for All Purposes to Hon. Thomas S.
Clark, Dept. 17]

CLASS ACTION

**DECLARATION OF SHARESE CASEY IN
SUPPORT OF MOTIONS FOR APPROVAL
OF CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

Date: February 24, 2025
Time: 8:30 a.m.
Courtroom: Dept. 17

Action Filed: July 26, 2023
Trial Date: Not Set

DECLARATION OF SHARESE CASEY

I, Sharese Casey, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter. This declaration is submitted in support of approval of the proposed class action settlement ("Settlement") reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Ridgecrest Regional Hospital ("Ridgecrest") at its Bella Sera facility from approximately September 2022 to approximately April 2023. I was hired as a Certified Nurse Assistant. My job duties involved monitoring 8 to 10 residents with serious developmental disabilities who required constant care and providing them assistance with basic life tasks. During the course of my employment, I do not believe I was properly compensated for all my working time because of Ridgecrest's time rounding policy that rounded my hours to the nearest quarter hour. I was required to clock in and out with my employee badge, but instead of crediting me for the exact time on my clock-ins, Ridgecrest rounded my time to the nearest quarter hour.

3. During my employment, I was frequently interrupted during my meal breaks and told to return to my job duties without clocking back in before returning to work. I was not permitted to clock back in on these occasions and I do not believe I was compensated for all my work time as a result. I also understand that my supervisors would manually deduct 30-minutes off of my hours worked without verifying that I actually received my meal break. This was the case whether I was able to take my full meal break or not.

4. The Bella Sera facility was frequently understaffed, and I was often required to remain at my post and continue to monitor the residents until I could find someone to cover. My supervisors would often come to the breakroom during my meal break and tell me to return to my post due to staff shortages. In those instances, I had to end my meal break immediately and return to work. I do not believe I was paid meal period premium payments on the occasions I was required to end my meal break early.

5. Similarly, Ridgecrest did not schedule any time for rest periods and as a result I was rarely authorized to take a rest period during the workday. Because it was so difficult to

1 arrange for coverage of my post, I simply had to forego rest periods altogether on most days. I do
2 not believe I was paid any rest period premiums for shifts that I did not receive all my rest periods.

3 6. During my employment, I earned extra pay when working the night and weekend
4 shift. My understanding is that Ridgecrest did not calculate my overtime, sick pay, and meal
5 premium wages correctly as a result of these payments.

6 7. I brought this lawsuit against Ridgecrest because I wanted Ridgecrest to comply
7 with the law and treat its employees fairly. I believe that I have taken on a greater burden than
8 any of the other Ridgecrest employees because I have been actively involved in the litigation, and
9 because it is my name that is attached to the lawsuit. I was willing to attach my name to the
10 lawsuit, even though I understood it would be a public record, because I felt that someone needed
11 to stand up to the company and I was willing to take on that burden for the benefit of my fellow
12 co-workers at Ridgecrest.

13 8. I have been an active participant in this case ever since first consulting with my
14 attorneys in September 2023. In addition to meeting with my attorneys during the initial intake
15 process, I have remained actively involved in moving this case towards resolution by providing
16 documents and information to my attorneys regarding Ridgecrest's wage and hour policies and
17 practices. I also made myself available the entire day of mediation to answer my attorneys
18 questions. I estimate that I have spent at least 25 or more total hours on activities leading to the
19 resolution of this matter.

20 I declare under penalty of perjury under the laws of the state of California and the United
21 States that the foregoing is true and correct. Executed on November 11/11, 2024, in Lancaster,
22 California.

23 
Sharese Casey (Nov 12, 2024 14:19 PST)
24 Sharese Casey
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the State of California, County of Los Angeles. I am over the age of 18 and not a party to the within suit; my business address is 725 S. Figueroa St., Suite 3100, Los Angeles, CA 90017.

On the date indicated below, I served the document described as: **DECLARATION OF SHARESE CASEY IN SUPPORT OF MOTIONS FOR APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT** on the interested parties in this action by sending ☐ the original [or] ☒ a true copy thereof ☒ to interested parties as follows [or] ☐ as stated on the attached service list:

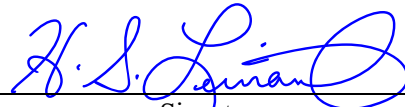
LIGHTGABLER LLP
Chandra A. Beaton
cbeaton@lightgablerlaw.com
Kathleen M. Fellows
kfellows@lightgablerlaw.com
760 Paseo Camarillo, Suite 300
Camarillo, CA 93010
Facsimile: (805) 248-7209

Counsel for Defendant

- ☐ **BY MAIL (ENCLOSED IN A SEALED ENVELOPE):** I deposited the envelope(s) for mailing in the ordinary course of business at Los Angeles, California. I am “readily familiar” with this firm’s practice of collection and processing correspondence for mailing. Under that practice, sealed envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.
- ☒ **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 e-mail address or e-mail of record in this action.
- ☐ **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.
- ☐ **BY OVERNIGHT DELIVERY:** I am “readily familiar” with this firm’s practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct. Executed on **January 22, 2025**, at Los Angeles, California.

H. Scott Leviant
Type or Print Name


Signature