

1 Greg A. Garbacz, Bar No. 167007
KLINEDINST PC
2 2 Park Plaza, Suite 1250
Irvine, California 92614
3 (949) 868-2600/FAX (714) 542-3592
ggarbacz@klinedinstlaw.com

4 Seana K. Scholtemeyer, Bar No. 244323
KLINEDINST PC
5 501 W. Broadway, Suite 1100
6 San Diego, California 92101
(619) 400-8000
7 sscholtemeyer@klinedinstlaw.com

8 Attorneys for Defendants SOCIAL SCIENCE
SERVICES, INC. DBA CEDAR HOUSE LIFE
9 CHANGE CENTER

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF RIVERSIDE, RIVERSIDE HALL OF JUSTICE**

13 GARY HERNANDEZ, individually, and on
14 behalf of all others similarly situated,

15 Plaintiff,

16 v.

17 SOCIAL SCIENCE SERVICES, INC. DBA
CEDAR HOUSE LIFE CHANGE CENTER, a
18 California nonprofit corporation; MFI
RECOVERY CENTER DBA ARLINGTON
19 RECOVERY COMMUNITY & SOBERING
CENTER, a California nonprofit corporation;
20 and DOES 1 through 10, inclusive,

21 Defendants.

Case No. CIVRI2303875

**DECLARATION OF SEANA
SCHOLTEMEYER IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: September 5, 2025
Time: 8:30 a.m.
Dept.: 1

Reservation 705529948351

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25 I, Seana Scholtemeyer, declare as follows:

26 1. I am an attorney at law duly licensed to appear before all courts in the State of
27 California and am senior counsel with the law firm of Klinedinst PC, attorneys of record for
28 Defendant Social Science Services, Inc. dba Cedar House Life Change Center ("Defendant").

1 2. I have personal knowledge of the following facts and, if called upon as a witness,
2 could competently testify thereto, except as to those matters which are explicitly set forth as based
3 upon my information and belief and, as to such matters, I am informed and believe that they are
4 true and correct. I submit this declaration in support of the Motion for Preliminary Approval of
5 Class Action and PAGA Settlement.

6 3. On July 31, 2023, Plaintiff Gary Hernandez (“Hernandez”) filed a putative wage
7 and hour class action in Riverside Superior Court against Social Science Services, Inc. dba Cedar
8 House Life Change Center, Case No. CIVRI2303875.

9 4. On August 23, 2023, pursuant to Labor Code § 2699.3(a), Hernandez gave notice
10 to the LWDA and Defendant that Hernandez intended to proceed with a representative action
11 under PAGA (LWDA-CM-977224-23).

12 5. On May 29, 2024, Hernandez submitted an amended PAGA notice adding
13 Plaintiffs Jasmine Aikens (“Aikens”) and Christopher Alaniz (“Alaniz”) (and collectively referred
14 to as “Plaintiffs”) to his PAGA claim.

15 6. On June 17, 2024, Hernandez filed his separate PAGA Representative Complaint in
16 Riverside Superior Court, Case No. CIVRI2403412.

17 7. On August 2, 2024, Hernandez filed a First Amended Complaint in the PAGA
18 action to add Plaintiffs Aikens and Alaniz.

19 8. On April 14, 2025, the Parties participated in an all-day mediation with Daniel
20 Turner. With the help of Mr. Turner, the Parties were able to reach an agreement to settle in
21 principle at mediation.

22 9. In advance of mediation, Defendant provided a representative sampling of time and
23 payroll data for class members and the related policies and procedures for Plaintiffs to analyze and
24 evaluate.

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1 10. I am not aware of any class, representative or other collective action lawsuit
2 pending in any other court in this or any jurisdiction that asserts claims similar to those asserted in
3 this action on behalf of a class or group of individuals who would also be members of the class
4 defined in this action.

5 I declare, under penalty of perjury, pursuant to the laws of the State of California, that the
6 foregoing is true and correct. Executed this 13th day of August at San Diego, California.

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8 Seana Scholtemeyer