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[Additional Counsel Information on Next Page]

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

CHELSEY RICHARDSON, BETHANY
JEANNE REINKER, and CHARMAINE HUFF as
individuals and on behalf of all others similarly
situated and aggrieved employees,

Plaintiffs,

vs.

TELECARE CORPORATION, a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. CV-24-006292

[Assigned for All Purposes to:
Hon. John R. Mayne, Dept. 21]

**DECLARATION OF CHARMAINE HUFF IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT, ATTORNEY'S FEES AND
COSTS, AND SERVICE AWARD**

(Filed concurrently with Motion for Final
Approval; Supporting Declarations; and
[Proposed] Judgment and Order)

Date: May 29, 2026
Time: 8:30 a.m.
Dept.: 21

Action Filed: August 9, 2024
Trial Date: None Set

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11 Attorneys for Plaintiffs and the Class

1 I, Charmaine Huff, hereby declare as follows:

2 1. I am over 18 years of age and a resident of California. I am one of the Plaintiffs and
3 proposed Class Representatives in the underlying Class Action against Defendant TELECARE
4 CORPORATION. I am providing this declaration in support of Plaintiff's Motion for Approval of the
5 Class/PAGA settlement. I provide the following information based on my own personal knowledge,
6 unless otherwise indicated. If called to testify as to the facts within, I would and could competently do
7 so.

8 2. I was employed by Defendant as a LVN Supervisor at Defendant's facility, Gladman
9 Mental Health and Rehabilitation Center. During my employment, I was subjected to numerous wage
10 and hour violations, including that Defendant often failed to provide me with proper meal and rest
11 periods.

12 3. After my employment ended, I sought a consultation with my attorney, Blake Jones Law,
13 PC, to determine if I had actionable claims. After discussing the matter with my attorney, I decided to
14 file the underlying Class Action against Defendant to seek redress from the unlawful employment
15 practices to which me and my coworkers have been subjected. I did not take this decision lightly. I
16 understood that there was a risk to my reputation in bringing a public lawsuit against my former
17 employer and potential financial ramifications in the event it proved unsuccessful. However, I felt that
18 Defendant needed to pay me and the other employees what we were owed.

19 4. Over the past nineteen months, I have spent no less than fifty-two hours helping my
20 attorney prosecute this case, including gathering documents concerning my employment,
21 communicating with my attorney regarding my claims, and answering numerous questions via telephone
22 and email. I routinely requested and received updates regarding the prosecution of the Action and did
23 everything I could to assist my attorneys. I thoroughly explained to them how things worked at
24 Defendant's operations and the wage and hour practices to which I was subjected.

25 5. In connection with the mediation, I helped my attorney prepare by revisiting our prior
26 discussions and responding to Defendant's arguments raised in connection therewith. I also received and
27 reviewed documents concerning Defendant's position and helped my attorney formulate our response to
28 these arguments. I also spent considerable time reviewing the Settlement Agreement and asked my

1 attorney questions to make sure that I fully understood them and that the terms were fair to me and my
2 coworkers.

3 6. In short, I believe I have done everything that my attorney has asked of me and have tried
4 my best to fairly represent the Class. I understand and fully accept my fiduciary obligations to the Class.
5 I believe that my efforts as the proposed Class Representative were material in reaching the Settlement. I
6 have no interest that are adverse to the Class. Accordingly, and considering the time and effort I have
7 spent obtaining this result, I respectfully request that the Court award my \$10,000 service award for
8 serving as the Class Representative.

9
10 I hereby declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct.

12 
Charmaine Huff (Dec 2, 2025 10:12:00 PST)

13 Charmaine Huff
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