

Jamie K. Serb, Esq. (SBN 289601)
jamie@crosnerlegal.com
Sepideh Ardestani, Esq. (SBN 274259)
sepideh@crosnerlegal.com
Zachary M. Crosner, Esq. (SBN 272295)
zach@crosnerlegal.com
CROSNER LEGAL, PC
9440 Santa Monica Blvd. Suite 301
Beverly Hills, CA 90210
Tel: (866) 276-7637
Fax: (310) 510-6429

Attorneys for Plaintiff RANDY GOAD

SUPERIOR COURT OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA

RANDY GOAD, on behalf of the State of
California and all Aggrieved Employees,

Plaintiff,

v.

SRG OPERATING, INC., a Delaware
Corporation; SENIOR RESOURCE GROUP
LLC, a Delaware Limited Liability
Company; SRG PARTNERS, LLC, a
Delaware Limited Liability Company; SRG
PARTNERS COMMUNITIES
INVESTMENT CO, LLC, a Delaware
Limited Liability Company; and DOES 1-
100, inclusive,

Defendants.

CASE NO. 24CV00643

Assigned for All Purposes to:
Hon. Donna D. Geck
Dept. 4

DECLARATION OF RANDY GOAD

Date: , 2025
Time: 8:30 a.m.
Dept.: 4

1 I, RANDY GOAD, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiff's Motion for Approval of Settlement under Private Attorneys
5 General Act.

6 2. I worked for Defendant SRG worked as a kitchen helper and a security guard at
7 Defendant's Santa Barbara location, from about August 2019 through May 2023. As a kitchen helper,
8 his duties included cleaning dishes, cleaning the dining room, setting up buffet tables, and assisting in
9 food preparation. He typically worked 3-5 shifts per week, from 12:00 p.m. to 9:00 p.m., and he
10 sometimes worked a double shift. As a security guard, his duties included patrolling the property
11 indoors and outdoors, ensuring doors were locked, and documenting any suspicious activity. While
12 worked there I don't believe I was paid correctly for all the hours I worked because I had to wait
13 in long lines to clock in/out for my shifts and for my lunch breaks, and this time was not paid for
14 even though I might spend 10-15 minutes per shift waiting in line. I also don't think I got all of
15 my lunches and rest breaks like I was supposed to, as many times because of the amount of work
16 I wouldn't get a break at all or it would late or cut short. I also was constantly using my own
17 phone while I was working to be in touch with my supervisors and. I never received any kind of
18 reimbursement for this.

19 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
20 employee of Defendant with regard to not being paid correctly, not getting all of my lunches and
21 breaks like I was supposed to, and not being reimbursed for using my own phone on company
22 business.

23 4. It is my understanding this lawsuit could not have been prosecuted or settled on
24 behalf of the other employees unless I or some other current or former employee decided to serve
25 as a named plaintiff and proposed PAGA representative. In deciding to serve as a named plaintiff
26 in this case, I understood that my name could be publicly attached to this lawsuit and that my
27 work experiences to some extent would be set forth in a public court file. I recognized I would
28 need to devote a certain amount of time that I could have spent otherwise. I also recognized my

1 bringing the lawsuit carried some degree of risk for defendants' legal costs among other things.
2 Despite this, I decided to serve as the named plaintiff and PAGA rep without any promise of
3 recovery or compensation.

4 5. I am familiar with the work involved in prosecuting this case. I have participated
5 in meetings, phone calls, and other communications with my lawyers regarding this case. I am
6 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
7 events in this case, including the investigation performed by my lawyers, the mediation with
8 Defendants that eventually resulted in this settlement, and the preparation of settlement papers
9 and the need to obtain court approval of the proposed settlement. I participated in the litigation
10 and provided my lawyers with information and documents regarding my employment with
11 Defendant.

12 6. I believe that the proposed settlement obtained on behalf of the State and other
13 aggrieved employees is excellent in view of the issues and risks involved with the case.

14 7. I believe I have fulfilled my duties as a named plaintiff, which required a
15 significant amount of time and effort during the course of this case. These efforts required
16 dedicating numerous hours to lawsuit activities including, but not limited to: (a) communicating
17 with my attorneys to stay informed of ongoing developments in the case and to discuss the
18 proposed settlement ultimately negotiated; (b) searching for and providing documents and other
19 materials relating to my work experience; (c) responding to requests for information relating to
20 my work experience; and (d) reviewing filings and key documents including drafts of the
21 complaint and the settlement agreement. These tasks required my dedication of at least 20 hours
22 of my time, which time I honestly could have spent on family, personal time, or work. My
23 understanding is that future tasks may require several more hours of my time. Further, at all times
24 I was ready, willing and able to testify at deposition and/or trial. I believe I have been diligent and
25 that I have acted above and beyond that of which is expected of a named plaintiff and proposed
26 class representative to date and will continue to do so.

27 8. It is my opinion that \$1,000.00 is a fair and adequate award for my service as the
28 named plaintiff and PAGA representative. I believe that amount is fair and reasonable in view of

1 the work I have and may have to continue to perform. I believe that my role as the named plaintiff
2 and PAGA representative in this lawsuit has resulted in a valuable benefit to the State and to the
3 other employees, and I accepted the potential risk of being liable for the opposing parties' costs if
4 we were unsuccessful in this lawsuit. I believed in this case, so I was willing to be the named
5 plaintiff and class rep to risk this and pursue this representative litigation. I also accepted the risk
6 that news of this lawsuit could also potentially impact my ability to secure other work.

7 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and
8 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

9 I declare under penalty of perjury under the laws of California that the foregoing is true
10 and correct. Executed on 05 / 09 / 2025, at 6269 Avenida Gorrión, California.
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Randy Goad
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