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Attorneys for Plaintiffs
LATASHA MARIE KNIGHTEN and
MEGAN KATHLEEN BERGER

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SONOMA

LATASHA MARIE KNIGHTEN AND
MEGAN KATHLEEN BERGER,
individually, and on behalf of all others
similarly situated,

Plaintiffs,

vs.

THE PETALUMA PEOPLE SERVICES
CENTER, a California non-profit corporation;
and DOES 1 through 100, inclusive,

Defendants.

CASE NO.: 24CV04614

**DECLARATION OF PLAINTIFF MEGAN
KATHLEEN BERGER IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Judge: Hon. Oscar A. Pardo

Date: October 8, 2026

Time: 3:00 PM

Dept.: 19

Complaint Filed: August 6, 2024

DECLARATION OF MEGAN KATHLEEN BERGER

I, Megan Kathleen Berger, hereby declare:

1. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I am one of the named Plaintiffs in this action. On or around August 6, 2024, the Class Action Complaint entitled *Knighen et al. v. The Petaluma People Services Center*, was filed in the Superior Court of California, Sonoma County, on behalf of Plaintiffs, and all others similarly situated. On or about October 15, 2024, Plaintiffs filed a First Amended Class Action Complaint adding myself as a Plaintiff and a claim for civil penalties pursuant to PAGA.

3. I was employed by Defendant The Petaluma People Services Center. ("Defendant") as a non-exempt hourly employee Emergency Medical and Crisis Worker from December 12, 2022 through October 20, 2023.

4. In my Emergency Medical and Crisis Worker capacity for Defendant they failed to pay me overtime and minimum wages. Further, Defendant also failed to afford me compliant meal/rest breaks. Additionally, Defendant failed to reimburse me for my necessary business expenses. Further, Defendant failed to properly pay me for alternative workweeks.

5. I understand that, as a Class Representative, I have a duty to look out for and protect the interests of the Class as a whole. I do not believe, nor do I have any reason to believe, that my interests in this lawsuit are in conflict or in any way antagonistic to the interests of those of my fellow Class Members.

6. As one of the named Plaintiffs in this action, I provided significant assistance to Plaintiffs' Counsel in this case. I spent approximately 35 hours relating to this case. Among other things, I participated in several lengthy interviews and phone conferences over a period lasting several months, searched for and produced a significant number of relevant documents, reviewed pleadings in the case, reviewed documents and data provided by Defendant, kept in contact with my attorneys regarding the status of the case, and remotely attended the all-day mediation on September 5, 2025. My efforts were instrumental in securing the favorable terms of the Settlement

Agreement, which will provide monetary compensation to a Class of approximately 226 Class Members.

7. In addition, this case also involved risks for me, such as the risk of having to pay Defendant's costs if we lost. Disregarding these risks, I pursued this case on behalf of the Class to a successful resolution and settlement.

8. It is my understanding that based upon my industrious efforts as one of the Named Plaintiffs in this action there is something called a Class Representative Service Payment. I respectfully request that the Court grant this award to me in the amount of \$10,000 in addition to my pro rata share of the settlement fund.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on July 10, 2026 in Sonoma County, California.

Megan Berger Escoto

Megan Berger Escoto (Jul 10, 2026 11:05:56 PDT)

Megan Kathleen Berger