

Kane Moon (SBN 249834)
kmoon@moonlawgroup.com
H. Scott Leviant (SBN 200834)
hsleviant@moonlawgroup.com
Jaeyoung Lee (SBN 344198)
jlee@moonlawgroup.com

MOON LAW GROUP, PC
725 S. Figueroa St., Suite 3100
Los Angeles, California 90017
Telephone: (213) 232-3128
Facsimile: (213) 232-3125

Attorneys for Plaintiff Nechelle Latrice Collins-Wright

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

NECHELLE LATRICE COLLINS-WRIGHT,
individually, and on behalf of all others similarly
situated,

Plaintiff,

vs.

HUMAN SERVICES ASSOCIATION, a
California corporation; and DOES 1 through 10,
inclusive,

Defendants

Case No.: 24STCV27767

[Assigned for all purposes to the Hon. Carolyn B.
Kuhl, Dept. 12]

CLASS ACTION

**DECLARATION OF NECHELLE LATRICE
COLLINS-WRIGHT REGARDING
MOTIONS FOR APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 5, 2026
Time: 10:30 a.m.
Courtroom: Dept. 12
Judge: Hon. Carolyn B. Kuhl

Action Filed: October 23, 2024
Trial Date: Not Set

DECLARATION OF NECHELLE LATRICE COLLINS-WRIGHT

I, Nechelle Latrice Collins-Wright, declare as follows:

1. I am a named Plaintiff in this case. I am a former employee of the named defendant, Human Services Association (“Defendant”). As such, I have personal knowledge of, or am informed and believe, the following facts herein stated. If called as a witness. I could and would testify competently to the following:

JOB DUTIES AND EXPERIENCES

2. I worked for Defendant during the Settlement Class Period in Defendant's facility located at Los Angeles, California. My employment began on or about January 2024 and ended on or about August 2024. I held a job position that is at issue in this case and included within the class.

3. I worked as an in-home outreach counselor and case manager, and my job duties included conducting home visits for clients to provide routine social services, client intervention, case management, and administrative tasks associated with these duties.

4. I manually input my clock in and out times on my cell phone application until they disabled that feature, and I had to log my times at my work computer at the office. I was informed by my co-workers that the timekeeping policy was to put in time to the quarter hour only. On several occasions where I worked past the scheduled shift, I was told by my supervisor what time to input. A “timekeeper” at the office had the authority to change our time, and sometimes I was notified when my hours worked was reduced by the timekeeper, and other times I noticed on my wage statement that the hours paid were lower than my actual hours worked. I also regularly missed my meal breaks due to the fact that I had to drive to each client’s location and because of work demands. I also always missed my rest periods because I could not make all the home visits scheduled while taking rest periods. I was not reimbursed for the use of my personal cell phone which I sued for GPS when travelling to client locations and also for internet usage during home visits. My wage statements did not accurately state the total hours I worked or all wages I was due. I also was not paid all wages due to me upon termination. I understand that Defendant disputes my allegations, and Defendant’s agreement to settle

this matter is not an admission that it accepts my allegations.

DUTIES OF A CLASS REPRESENTATIVE

5. This lawsuit is not an individual lawsuit. It is a proposed class action. I understand that, if approved as a class representative in this matter, I have an obligation to do my best to look out for the interests of other class members, the current and former employees of Defendant who I am seeking to represent. I understand that my obligations to the class exist even when the class is certified solely as part of a class action settlement. It is my understanding that, as one part of this duty to the class, I cannot agree to a settlement to benefit myself to the exclusion of the rest of the class members. I have never asked my attorneys to simply settle this matter at any cost. Rather, I have asked them to obtain the best settlement they could within reason, and I believe that they have attempted to do so.

6. This case was filed about one year ago. I have never asked to be relieved from my role as a proposed class representative. To the contrary, I have made myself available whenever my attorneys wanted to discuss aspects of my employment with Defendant, and I remain committed to seeing this matter through to the end.

7. I have conferred with my attorneys about the settlement proposed in this case. I am not an accountant, but I understand the factors and risks that need to be considered when evaluating a settlement.

8. Summing it all up in the simplest terms, I am asking to be stand-in for other employees of Defendant. Because of that, I cannot quit on the Class, and I cannot put myself and my interests before the Class. I accept these duties and request that I be approved as the class representative for purposes of this amended Settlement.

COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY

9. I was an hourly non-exempt employee of Defendant and was subject to the same pay structure and rules as all the other hourly non-exempt employees of Defendant.

10. I am not aware of anything special about me that would raise unique defenses to my claims, as opposed to the claims of the class. I am also not suing for anything unique to me. Rather, my

claims are based upon the same facts that relate to the rest of the Class.

11. I do not believe that I have any conflicts with Class Members included in this proposed Settlement. I do not have any intention to take any action that would place me in a position that is hostile to other Class Members.

SERVICE AS A CLASS REPRESENTATIVE

12. I believe that were it not for my stepping forward and taking on the duties of protecting the interests of other Defendant employees, it is likely that the interests of the class would neither have been prosecuted, nor benefited. To my knowledge, other than the litigation encompassed by this proposed Settlement, there is no other litigation, on a class or individual basis, concerning the claims in this lawsuit. Nor has Defendant pointed to any.

13. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to search for information online these days, I will face an increased risk that future employers will discover information about this lawsuit online and have a negative reaction to learning that I sued an employer. This may make it harder for me to obtain future employment or change jobs for a better opportunity.

14. I have devoted a substantial amount of my time, both before this lawsuit was filed and also during its litigation to ensure a fair result for the employee class. This involved ongoing communications and participation with my counsel during the course of this case.

15. My participation began with bringing certain issues that are involved in this matter to my counsel's attention, and explaining the factual background that was used to prosecute the claims in this case.

16. For example, I reviewed documents which I already had, I provided relevant documents to my counsel, and I explained those documents and related facts to my counsel to assist them in their review. I also assisted in identifying potential witnesses, including other employees, who might likewise have been of assistance.

17. My efforts continued after suit was filed. For example, I continued to identify employees and other witnesses to counsel, along with other information as to how they could be of

potential use in this matter. I also discussed strategy with my counsel.

18. Prior to mediation, I attended multiple meetings with my attorneys to provide additional detailed information and review various documents. I also made myself available during the mediation in order to answer any questions that my attorneys had for me.

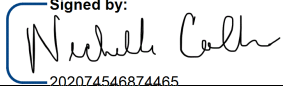
19. After the mediation, a long-form settlement agreement was negotiated, and I reviewed it with my attorneys as well as I was able to ensure that its terms are likewise fair and adequate.

20. In sum, I believe I have provided well over 50 hours of my time during the course of this litigation to ensure a good outcome for the best interests of the class.

21. I do not believe that I have any conflicts with Class Members included in this proposed Settlement.

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

Executed on 2/20/2026, in California.

Signed by:

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Nechelle Latrice Collins-Wright, "Declarant"