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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SONOMA**

11 DANIELLE MANLEY, an individual and on
12 behalf of all others similarly situated,

13 Plaintiff,

14 v.

15 HANGER PROSTHETICS & ORTHOTICS
WEST, INC., a California corporation; and
16 DOES 1 through 50,

17 Defendants.

Case No.: 24CV05962

[Assigned for All Purposes to:
Hon. Bradford Demeo, Dept. 17]

**DECLARATION OF DANIELLE
MANLEY IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

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

DATE: To Be Assigned
TIME: To Be Assigned
DEPT: 17

Action Filed: December 11, 2024
Trial Date: Not Set

1 I, Danielle Manley, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. This declaration is submitted in support of approval of the proposed class action
4 settlement ("Settlement") reached in this case. I have personal knowledge of the facts contained in
5 this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I was employed by Defendant Hanger Prosthetics & Orthotics West, Inc.
7 ("Defendant") as an hourly-paid, non-exempt employee in the position of Office Administrator
8 from approximately August 2023 to August 2024 in Santa Rosa, California. During my employment
9 with Defendant, I was subject to Defendant's wage and hour policies and practices that are at issue
10 in this case.

11 3. Specifically, I believe Defendant unlawfully rounded my time punches resulting in
12 unpaid wages, including overtime wages, I earned non-discretionary incentive compensation which
13 was not properly factored into my regular rate of pay, and I sometimes could not take my meal and
14 rest breaks because of my workload. As a result of the foregoing issues, I believe I received
15 inaccurate wage statements and was not paid all wages when my employment with Defendant
16 ended. I believe other non-exempt employees of Defendant were subject to the same policies and
17 procedures discussed above and that my claims against Defendant for unpaid wages and statutory
18 and civil penalties are typical of Class Members' claims.

19 4. I have been actively involved in this case since I first retained Justice for Workers,
20 P.C. ("JFW") in December 2024. Without waiving the attorney-client privilege, prior to filing this
21 lawsuit, my attorneys explained my role and responsibilities as a Class Representative, and I
22 understand my responsibilities as a Class Representative. Since retaining my attorneys, I have had
23 many discussions and meetings with the attorneys and staff at JFW, discussions regarding
24 Defendant's wage and hour practices and my claims in this case, litigation strategy, updates on how
25 the case was proceeding, the Settlement, and how I could help the case and potential Class
26 Members. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant
27 documents with my attorneys. I estimate that I have spent at least 20 hours on this case from the
28 time I first spoke with my attorneys regarding this case until the present. I also understand that as

1 part of the Settlement, I have agreed to a general release of claims against Defendant, which is
2 broader than the release of claims agreed to by other Class Members.

3 5. Furthermore, there is no conflict between my interests and the interests of the class
4 that I am seeking to represent. My interests are entirely coextensive with the interests of the Class. I
5 allege that I was injured by the same company-wide policies and practices to which the proposed
6 Class was subjected and seek the same relief. I have already demonstrated my ability to advocate
7 for the interests of the Class by initiating this litigation, undertaking extensive class discovery, and
8 evaluating the proposed settlement to assure that it is fair.

9 6. I understood that at the time I filed this action, as a Class Representative, I owed a
10 duty to the putative class members to faithfully prosecute this action with their best interests at the
11 forefront of every decision. I understood that I could not make any decision in this action for the
12 sole benefit of my personal interest. I understood that in executing this duty, I might have been
13 asked to sacrifice my personal best interests for the benefit of the interests of the putative class
14 members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the
15 broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful
16 wage and hour practices. I believe that I faithfully executed the duties of a Class Representative
17 throughout this litigation and will continue to do until this litigation is fully and finally resolved.

18 7. I understand that my attorneys will request that the Court approve a service award
19 of \$10,000.00 for my efforts on behalf of the Class. I believe this amount is reasonable based on the
20 amount of time and effort I have devoted to this case, the risks I have undertaken as a Class
21 Representative including being sued by Defendant, and my general release of claims, as described
22 above. My support for the Settlement is not contingent on my receiving this service award.

23 8. I do not have any conflict of interest with the proposed Administrator, Phoenix
24 Settlement Administrators.

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

3 Executed on June 18, 2026 at Santa Rosa, California.

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Danielle Manley