

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858)551-1223

Facsimile: (858) 551-1232

Website: www.bamlawca.com

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

ANDREA COOKS, an individual, on behalf of
herself and on behalf of all persons similarly
situated,

Plaintiff,

vs.

ON LOK COMMUNITY HOUSING, INC., a
California Corporation; ON LOK DAY
SERVICES, a California Corporation; ON
LOK HOUSE, INC., a California Corporation;
ON LOK SENIOR HEALTH SERVICES, a
California Corporation; ON LOK, INC., a
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: CGC-24-620841

**DECLARATION OF ANDREA COOKS IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT**

Hearing Date: September 23, 2026
Hearing Time: 9:00 a.m.

Judge: Hon. Christine Van Aken
Dept: 301

Date Filed: December 20, 2024
Trial Date: Not set

DECLARATION OF ANDREA COOKS IN SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT

1 I, Andrea Cooks, declare as follows:

2 1. I am over the age of eighteen, a Plaintiff and a proposed Class Representative in the
3 above-entitled matter. I submit this declaration in support of the Motion for Preliminary Approval
4 of Class Settlement and in support of my application for a Class Representative Service Payment.

5 2. I have personal knowledge of all the facts stated herein. I could and would competently
6 testify under oath to these facts in court if requested to do so.

7 3. During the class period I worked as a caregiver for Defendant On Lok Sr Health Services
8 (“Defendant”) in California and during that time period I was classified by Defendant as a non-
9 exempt employee.

10 4. I retained my attorneys who are experienced in both class action and PAGA representative
11 action litigation and claims against employers for violations of the California Labor Code. I have
12 no personal relationship or family ties to my attorneys or any officer of the Court. I am not aware
13 of having any actual or potential conflicts of interest with another class member in this case. I am
14 not aware of any other pending matter or action asserting claims that will be extinguished or
15 adversely affected by this settlement.

16 5. I decided to pursue this class action lawsuit and be a plaintiff/class representative
17 because I felt that my legal rights as an employee and others like me were violated. I often did not
18 receive compliant meal and rest breaks because they were late, interrupted, or missed entirely.
19 Defendant also did not pay all required meal and rest break premiums. Sometimes, I was required
20 to work off the clock. I also had to use my personal cell phone for work-related purposes without
21 reimbursement. I believe some of my wage statements were inaccurate because Defendant
22 miscalculated my overtime and other wages, which resulted in me being underpaid during certain
23 pay periods.

24 6. I spoke to my attorneys several times and discussed how Defendants implemented their
25 company policies and procedures. I also assisted my attorneys in their investigation into my claims
26 by providing them documents and answering their questions. I reviewed the complaint before it
27 was filed and, after it was filed, I was given access to an electronic file sharing program that

28
DECLARATION OF ANDREA COOKS IN SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT

1 alerted me via email when important documents were filed so that I could review them and keep
2 up with the developments in the case which I understood was one of my duties as a class
3 representative. I would also contact my attorneys from time to time if I had any questions about
4 the case.

5 7. Even though this action is in the process of settling, I was and remain prepared to perform
6 all the duties of a class representative. I understand that as a class representative I have assumed a
7 fiduciary responsibility to prosecute this class action on behalf of the absent class members. I
8 have understood that as a fiduciary, I have a duty to prosecute this action for the benefit of the
9 class members and surrender any right to compromise the group action for an individual gain.

10 8. I understood that being a plaintiff/class representative in this case meant that I was seeking
11 damages not only for myself but also other current and/or former non-exempt employees working
12 for Defendants in California who make up the class. I felt that these individuals were not aware of
13 their labor law rights and even if they were they would probably be apprehensive about speaking
14 up or even simply because of the time, effort and risk involved in filing a class action lawsuit.

15 9. I understood that being a part of this lawsuit involved risks. For example, my attorneys
16 explained to me that if the case went to trial and we lost, I could be held responsible to pay for all
17 or part of the attorney fees and costs paid by Defendants to defend this lawsuit. Also, I knew there
18 was a risk that future employers, if they ever find out about this lawsuit, could hold it against me
19 or downgrade me as a potential hire. As the only named Plaintiff in this case, it would not be
20 difficult for a future employer to become aware that I sued my employer for labor law violations.
21 Ultimately I decided these risks were worth it and decided to fight for my rights and the rights of
22 others regardless of the risks, time and effort I spent on this case.

23 10. During the lawsuit I stayed in touch with my attorneys by phone and email. I also kept up
24 to date on important developments by reviewing court filings that were made available to me
25 electronically as I described above.

26 11. A mediation took place on October 1, 2025 with Francis J. Ortman III, Esq., a well-
27 respected and experienced mediator of wage and hour class actions. After the mediation the parties

28

DECLARATION OF ANDREA COOKS IN SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT

1 were able to come to an agreement to settle the action. I communicated with my attorneys
2 regarding the terms of the settlement which was reached between the parties and understood that I
3 was representing absent class members and therefore wanted the best possible result to be obtained
4 for the class members and I believe a very positive result was in fact achieved via settlement. I
5 reviewed and signed the Memorandum of Understanding on October 1, 2025.

6 12. I have been actively involved with this lawsuit performing the duties described above.
7 Although I did not keep time records, I was in regular contact with my attorneys, reviewed court
8 filings, and spent a significant amount of time on the issues presented during the lawsuit and in the
9 settlement process. I estimate that I spent approximately 20-30 hours working on this case up
10 until this point. I believe I have been diligent and have done what is expected of a named plaintiff
11 and a proposed class representative to date, and will continue to do so. I have and always will
12 maintain the best interest of the class members.

13 13. My attorneys explained to me that the settlement process involves a two-step review by the
14 Court to determine whether the settlement is fair before approving the settlement. I know this
15 process also involves notifying all class members of the settlement terms and of their rights to
16 make a claim for their settlement share, to opt out of the settlement or to object to the settlement.

17 14. I believe I did the right thing by filing this case on behalf of the class members who,
18 subject to court approval, are in line to receive monetary payments as a result of this case and
19 settlement. This is money they may never have ever gotten if I did not pursue this action on their
20 behalf. I feel significant personal satisfaction to know that I played a role in the class members
21 being entitled to monetary payments as a result of the filing of this lawsuit. I also believe that the
22 requested Class Representative Service Payment of \$15,000 from the settlement is fair
23 compensation for the work I performed and the risks I undertook.

24 15. As part of the settlement it was necessary for me to sign a general release of all claims I
25 may have against Defendants. I believe the Class Representative Service Payment I have requested
26 provides me with some compensation for this agreed release.

27 16. In light of all the time and effort I have spent on this case, the risk I undertook by suing my
28

DECLARATION OF ANDREA COOKS IN SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT

1 employer, the exposure to being responsible for paying Defendants' costs in the event we did not
2 win the case, the reputational risk that future employers may hold this lawsuit against me, the
3 general release and in light of the size of the settlement, I believe the request for \$15,000 as a
4 Class Representative service payment is fair and reasonable.

5 ///

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF ANDREA COOKS IN SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT

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

3
4 Executed on 08/18/2026, at Oakland ca.
5 (city, state)

6 
Andrea Cooks (Aug 18, 2026 20:53:21 EDT)

7 Andrea Cooks
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

28 DECLARATION OF ANDREA COOKS IN SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT