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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

ISAIAH D. HUGHES, an individual, on behalf
of himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

ASIAN AND PACIFIC ISLANDER
WELLNESS CENTER, INC. (dba SAN
FRANCISCO COMMUNITY HEALTH
CENTER), a California corporation; and DOES
1-50, Inclusive,

Defendants.

Case No. CGC-22-599270

**DECLARATION OF ISAIAH D. HUGHES
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: November 2, 2023

Time: 9:30 a.m.

Judge: Hon. Anne-Christine Massullo

Dept.: 610

1 I, ISAIAH D. HUGHES, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above
4 wage and hour class action filed against ASIAN AND PACIFIC ISLANDER WELLNESS CENTER,
5 INC., *dba* SAN FRANCISCO COMMUNITY HEALTH CENTER (hereinafter “Defendant”).

6 2. This declaration is being submitted in support of Plaintiff’s Motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. I believe that I am, have been, and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
10 to represent.

11 4. I was employed by Defendant from June of 2017 to June of 2021 as a non-exempt
12 employee. During my employment, I was denied legally compliant meal and rest periods, minimum
13 wages and overtime compensation. Throughout my employment, I was subject to Defendant’s written
14 policies and procedures contained in, among other documents, the “Employee Handbook.”

15 5. Generally, my lawsuit claims that Defendant failed to provide compliant meal and rest
16 periods, maintained an unlawful rounding practice, and failed to pay for all hours worked.

17 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
18 to represent because I was subject to the same alleged unlawful employment policies and practices at
19 issue in this action, including but not limited to, Defendant’s failure to provide complaint meal and
20 rest periods and failure to maintain records that reflect the start and stop times of employee’s work
21 periods. Factually, Defendant’s policies and practices apply class wide, and Defendant’s liability can
22 be determined by facts common to all members of the Class.

23 7. Further, there is no conflict between my interests and the interests of the class that I am
24 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
25 I was injured by the same company-wide policies and practices to which the proposed Class was
26 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
27 of the Class by initiating this litigation, and evaluating the proposed settlement to assure that it is fair.

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

9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate, and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed Sep 7, 2023, at San Francisco, California.

By: ISAIAH HUGHES (Sep 7, 2023 11:00 PDT)
ISAIAH D. HUGHES