

LAWYERS FOR JUSTICE, PC

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Ryan Slinger (SBN 351297)
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
John L. Nitti (State Bar #330752)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
jnitti@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Nicole Noursamadi (State Bar #357246)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
shani@zakaylaw.com
nicole@zakaylaw.com

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

NATASHA TAYLOR, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

v.

THE WEST OAKLAND HEALTH
COUNCIL, a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No. RG20049604

**DECLARATION OF NATASHA TAYLOR
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

Date: February 25, 2025

Time: 1:30 p.m.

Reservation ID: 803492234138

Judge: Hon. Somnath Raj Chatterjee

Dept.: 21

1 I, NATASHA TAYLOR, 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 and representative action filed against The West Oakland Health Council
5 (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 of the Class Members that I am
10 seeking to represent.

11 4. I worked for Defendant as a non-exempt employee in California between June 2017 to
12 approximately September 2017. At all times during my employment, I was paid in an hourly wage
13 and was entitled to legally compliant meal and rest periods. Throughout my employment, I was subject
14 to Defendant's written policies and procedures contained in, among other documents, the "West
15 Oakland Health Council Employee Handbook."

16 5. Generally, my lawsuit claims that Defendant failed to provide compliant meal and rest
17 periods, failed to pay for all time worked, failed to pay overtime and sick pay at the correct regular
18 rate of pay, failed to reimburse for mandatory business expenses, failed to furnish accurate itemized
19 wage statements, and failed to pay all wages when due.

20 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
21 to represent because I was subject to the same alleged unlawful employment policies and practices at
22 issue in this action, including but not limited to, Defendant's failure to provide compliant meal and
23 rest periods, failure to pay for all time worked, failure to pay overtime and sick pay at the correct
24 regular rate of pay, failure to reimburse for mandatory business expenses, failure to furnish accurate
25 itemized wage statements, and failure to pay all wages when due. Factually, Defendant's policies and
26 practices apply class wide, and Defendant's liability can be determined by facts common to all
27 members of the Class.

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

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

16 9. I believe that the proposed settlement before the Court is fair, reasonable and adequate,
17 and made in the best interest of the Settlement Class Members. Consequently, I respectfully ask the
18 Court to grant preliminary approval of the Settlement and all of its terms.
19

20 I declare under the penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed 01/28/2025, at Oakland, California.
22

23 By:  (Jan 28, 2025 09:41 PST)
24 NATASHA TAYLOR
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