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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LASSEN

NATALIE CHRESTENSEN; DELORIS
RIDDLE, individuals, on behalf of themselves
and on behalf of all persons similarly situated,

Plaintiffs,

v.

NORTHEASTERN RURAL HEALTH
CLINICS, a California Corporation; and DOES
1-50, Inclusive;

Defendants.

Case No. 63703

**DECLARATION OF NATALIE
CHRESTENSEN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: November 8, 2022
Time: 9:00 a.m.

Dept.: D

1 I, NATALIE CHRESTENSEN, 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 defendant NORTHEASTERN RURAL
5 HEALTH CLINICS (hereinafter "Defendant").

6 2. This declaration is being submitted in support of Plaintiffs' 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 worked for Defendant as a non-exempt employee in California from April of 2019 to
12 September of 2020. During my employment, I worked as a referral coordinator. At all times during
13 my employment, I was entitled to legally compliant meal and/or rest periods, minimum and overtime
14 wages, and reimbursement for required business expenses. Throughout my employment, I was subject
15 to Defendant's written policies and procedures contained in, among other documents, the
16 "Northeastern Rural Health Clinics Employee Handbook."

17 5. Generally, my lawsuit claims that Defendant failed to pay for all time worked, including
18 overtime compensation, failed to provide compliant meal and rest periods, failed to issue accurate
19 itemized wage statements, failed to reimburse for all required business expenses, and failed to pay all
20 wages when due.

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

