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6 Attorneys for Defendant CHILDREN'S
SPECIALISTS OF SAN DIEGO, A MEDICAL
7 GROUP, INC.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

10
11 JESSICA HORRIGAN, an individual, on
behalf of herself and on behalf of all other
12 persons similarly situated,

13 Plaintiffs,

14 vs.

15 CHILDREN'S SPECIALISTS OF SAN
DIEGO, A MEDICAL GROUP, INC., a
16 California Corporation; and DOES 1-50,
Inclusive,

17 Defendants.
18

Case No. 37-2021-00014044-CU-OE-CTL

Assigned to: Hon. Joel R. Wohlfeil
Dept. C-73

DECLARATION OF TOM KOZA

Action Filed: March 30, 2021
Trial Date: January 21, 2023

19 I, TOM KOZA, declare as follows:

20 1. I am Payroll Manager at Rady Children's Hospital - San Diego, providing payroll
21 services for Defendant CHILDREN'S SPECIALISTS OF SAN DIEGO, A MEDICAL GROUP,
22 INC., ("CSSD") in the above-action. I am familiar with the payroll systems, including time
23 keeping and payroll policies, procedures, and records.

24 2. I have personal knowledge of the facts set forth herein, and if called as a witness to
25 testify thereto, I could competently and truthfully do so.

26 3. Pursuant to the settlement of this action, I was asked to calculate the total number
27 of Class Members and applicable workweeks said Class Members worked at CSSD during the
28 period of March 30, 2017 to January 18, 2022.

4. The total number of Class Members is 151.

5. The total number of workweeks for the Class Members is 13,737.

6. To come to this total, I first pulled the “Employee Daily Total Report” within the ADP reporting module. The hours are categorized as either productive or non-productive hours per week. I then narrowed that report to only include the Class Members only. I further narrowed the report to the applicable class period. I then filtered out non-productive hours to produce a weekly total for each employee by week for the defined period.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on this 31st day of May, 2022, at San Diego, California.

Tom Koza
TOM KOZA