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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

FRANKLIN AMOG, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

EL CAMINO HOSPITAL, a California
nonprofit public benefit corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 20CV363828

(Assigned to the Honorable Patricia M. Lucas,
Dept. 3)

**DECLARATION OF FRANKLIN AMOG IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: October 13, 2021

Time: 1:30 p.m.

Dept.: 3

DECLARATION OF FRANKLIN AMOG

I, Franklin Amog, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. During the period of about May 2017 to April 12, 2019, I worked as a non-exempt, hourly employee for El Camino Hospital ("Defendant").

3. During my employment with Defendant, I received shift differential and per diem wages. Whenever I was paid shift differential and/or per diem wages, the wage statements I received did not identify the correct total hours worked.

4. During the pendency of this lawsuit, I have done my best to represent the interests of the employees that are part of the class. I have actively contributed to this case. This includes: (1) participating in numerous telephonic meetings with my attorneys and their staff; (2) providing my attorneys with information and documents regarding my employment with Defendant; (3) preparing for and making myself available for the mediation; (4) reviewing and executing the Memorandum of Understanding; (6) reviewing and executing the settlement agreement; and (7) reviewing and signing the declarations submitted to this Court in support of the settlement. Throughout the lawsuit, I have been kept apprised of the status of this case.

5. I understand that the class claims alleged in this action were brought on behalf of other similarly situated employees, and thus I am acting as a representative for the Class. As the class representative, I understand that it is my responsibility to act in the Class's best interest and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

6. I have and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed class and will carry out those duties as necessary.

11 9. As part of the settlement, I also agreed to sign a general release of claims and a
12 waiver of Civil Code section 1542

15 Executed on this 10 day of September 2021, at Los Angeles, California.


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