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Attorney for Plaintiff SARAH STONEHOCKER

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SARAH STONEHOCKER, on behalf of herself
and all others similarly situated

Plaintiff,

v.

KINDRED HEALTHCARE OPERATING, LLC
and DOES 1-25,

Defendants.

Case No.: 4:19-cv-02494-YGR

**DECLARATION OF SARAH
STONEHOCKER IN SUPPORT OF IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT AND
APPROVAL OF PAGA SETTLEMENT**

Date: November 10, 2020

Time: 2:00 p.m.

Judge: Hon. Yvonne Gonzalez Rogers

Dept.: Courtroom 1, Fourth Floor

Complaint Filed: February 14, 2019
(San Francisco Superior Court)

DECLARATION OF SARAH STONEHOCKER IN SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PAGA
SETTLEMENT

CASE NO. 4:19-cv-02494-YGR

1 I, Sarah Stonehocker, declare as follows:

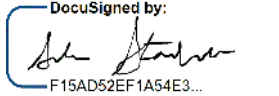
- 2 1. I am the named Plaintiff in this action. I have personal knowledge of the information set
3 forth in this Declaration.
- 4 2. I was first hired by Kindred Rehab Services, Inc. as a full time Occupational Therapist
5 (“OT”) in Kindred’s Skilled Nursing Facilities (“SNFs”) in San Francisco on or around
6 October 31, 2006. For the next approximately 10 years, I worked at multiple SNFs
7 around the Bay Area. On or around October 17, 2016, I transitioned to a position as a
8 home health care OT, where my employer changed to Professional Healthcare at Home,
9 LLC (“PHH”).
- 10 3. During an approximately one-month period in or around July 2015, I filled in as a
11 temporary “Program Director” while the existing Program Director was away. Program
12 Directors are Occupational Therapists, Physical Therapists, and Speech Language
13 Pathologists who perform those job functions but who also take on first-level oversight
14 duties.
- 15 4. During my time as a Program Director, I was classified as a non-exempt employee, I
16 provided direct patient care in the scope of my duties, and I was subject to PCR review
17 by my superiors. Indeed, several productivity-related spreadsheets emailed to me during
18 my time as Program Director included productivity metrics for me and other first-level
19 managers.
- 20 5. I am also familiar with the Physical Therapist Assistant and Occupational Therapist
21 Assistant job titles and duties. Like all other job categories included in the Settlement’s
22 definition of “Skilled Clinician”, Physical Therapist Assistant and Occupational Therapist
23 Assistant duties include providing skilled direct patient care; however, Assistants provide
24 skilled direct patient care under the direction of Physical and Occupational Therapists.
25 Additionally, like all other job categories included in the Settlement’s definition of
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1 “Skilled Clinician”, Assistants have been similarly subject to Kindred’s productivity
2 standards.

- 3 6. I have reviewed the job titles included in the “Skilled Clinician” definition in the
4 Settlement, and the positions are similar in that they effectively encompass only
5 individuals who provide direct patient care at SNFs, such as Occupational Therapists,
6 Physical Therapists, Speech Therapists, Speech Language Pathologists, Respiratory
7 Therapists in California.
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10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct.

12 Executed on October 2, 2020, in San Francisco, California.

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14 By:  F15AD52EF1A54E3...
15 Sarah Stonehocker
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