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Attorneys for Plaintiff and the Putative Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ANGELES

CARRIE PRODROMIDES, an individual,

Plaintiff,

vs.

SHORELINE TREATMENT CENTER, INC., a
California Corporation; RACHEL LEVI, an
individual, and DOES 1 through 50, inclusive,

Defendants.

CLASS ACTION

Case No: 20STCV47287

Hon. Stuart Rice

Dept. 1

**DECLARATION OF CARRIE
PRODROMIDES IN SUPPORT OF HER
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PRIVATE
ATTORNEY GENERAL ACT
SETTLEMENT**

Date: June 7, 2024

Time: 10:30 a.m.

Dept.: 1

Complaint Filed: December 10, 2020

Initial Trial Date: None

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DECLARATION OF CARRIE STEWARD

I, Carrie Steward, hereby declare as follows:

1. I am over the age of 18 and a resident of California. I have personal and first-hand knowledge of the matters stated herein, and, if called and sworn as a witness, I could and would testify competently hereto. In March of 2024, I changed my name from “Prodromides” to “Steward.”

2. I submit this declaration in support of my Motion for Final Approval of Class Action And Private Attorney General Act Settlement.

3. Through my attorneys, I filed this class action lawsuit against Defendants Shoreline Treatment Center, Inc., Rachel Levi on December 10, 2020, styled *Prodromides v. Shoreline Treatment Center, Inc. et. al.*, Case No. 20STCV47287, alleging causes of action on behalf of myself and on all non-exempt hourly employees for (1) Failure to Pay Overtime and Double Time Compensation, (2) Failure to Provide Meal Periods, (3) Failure to Provide Rest Periods, (4) Failure to Provide Accurate Itemized Wage Statements, (5) Waiting Time Penalties, and (6) Unfair Competition and Unlawful Business Practices.

4. Through my attorneys, I filed First Amended Class Action Complaint on April 28, 2021, alleging a cause of action seeking civil penalties pursuant to the Private Attorney General Act of 2004 (“PAGA”).

5. Throughout this action I have had independent knowledge of this case, I understand my fiduciary responsibilities to protect the interests of the absent class members, and I have worked vigorously with my attorneys to protect the interests of the absent putative class members. More specifically:

a. I initially consulted with my attorneys for numerous hours before the initiation of this action to provide them with preliminary facts and documents necessary to investigate all potential claims against the Defendants.

b. Throughout the litigation I maintained regular communications with my attorneys to let them know of any new developments and to request updates from them. My attorneys and I would regularly communicate about any new developments or updates about the case. Phone calls would typically last approximately 10 to twenty

minutes, but at times they would last as long as an hour.

- c. I actively reached out and spoke with putative class members and other potential witnesses regarding the facts of the case, and I was able to obtain their consent to provide their names and contact information to my attorneys.
- d. When I learned that Rachel Levi was attempting to pick off the putative class members, I informed my attorneys, and I also obtained copies of the release agreements, which I also forwarded to my attorneys. Because I was able to obtain the release agreements, my attorneys were able to review them.
- e. Because of my efforts, my attorneys were able to find potential witnesses to corroborate the Labor Code violations and were able to find out that Defendants were attempting to pick off the members of the putative class.
- f. I discussed Defendants' discovery responses with my attorneys to help them prepare certain lines of questioning for their depositions.
- g. I also answered questions from my attorney regarding potential settlement subjects in advance of the mediation, and I was in constant communication with my attorneys even after the case settled at mediation.
- h. I reviewed documents such as the Settlement Agreement and my declarations and provided my signature.
- i. I believe that I have dedicated approximately 40 hours of my time assisting my attorneys with this action.

6. My attorneys explained the risks and benefits of bringing a class action. I understood the professional and financial risks of being the Class Representative. I also understood that pursuing the case as a class action rather than an individual case meant that it would likely take longer to receive any recovery because of the multi-step approval process that the courts require. I also understood the possibility of receiving no recovery given the risks and complexities of class action litigation.

7. I decided to file this action because it is the right thing to do to protect the rights and interests of the current and former non-exempt employees of these Defendants.

8. I willingly took the risks and burdens of litigation because I felt so strongly about serving as Class Representative and representing the Class Members in this case.

9. I have not received any personal benefit from this case other than knowing that the other employees will receive fair compensation for the wages that are due to them.

10. The healthcare profession is a small community and despite this, I decided to serve as Class Representative at great risk to my professional reputation.

11. I also had to endure personal difficulties including taking time away from work and my free time to attend meetings and conferences with my lawyers. Further, I would have to review documents and discuss the case with my lawyers either after work or during my free time.

12. The claims I assert and the remedies I seek on behalf of myself are similar to the claims I assert and the remedies I seek on behalf of the absent class members, which are unpaid wages including overtime, premium payments for meal and rest break violations, statutory penalties for the derivative claims, and civil penalties under PAGA.

13. I have never been convicted of a felony, nor am I aware of any instance or circumstance that would cast doubt on or question my honesty, veracity, or credibility to serve as a class representative.

14. Pursuant to the terms of the Settlement, I understand that the Defendants will not object to or oppose my request for a service award of \$15,000. At the time of Final Approval, however, I will reduce my request to \$7,500, the remainder of which will go to and benefit the absent class members. I also understand that this service award is a separate payment in addition to any amounts I would ordinarily be entitled to recover as a participating class member or as an aggrieved employee, under the terms of the Settlement.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct, this 15th day of May, 2024.

Carrie Steward

CARRIE STEWARD

RE: *Prodromides v. Shoreline Treatment Center, Inc, et. al.*
Case No: 20STCV47287

On **May 16, 2024** I served true and correct copies the following document(s) described as:

on the interested parties in this action as follows:

Richard Kim, Esq.
rkim@richkimlaw.com
LAW OFFICES OF RICHARD KIM, PC
6131 Orangethorpe Ave., Suite 370
Buena Park, CA 90620-4929
Attorneys for Plaintiffs and the Putative Class

*Attorneys for Defendants
SHORELINE TREATMENT CENTER, LLC,
f/k/a SHORELINE TREATMENT CENTER,
INC.; RACHEL LEVI; ODYSSEY
BEHAVIORAL HEALTHCARE, LLC*

☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **May 16, 2024** at Los Angeles, California.

Signature

1 **PROOF OF SERVICE**

2 **RE: *Prodromides v. Shoreline Treatment Center, Inc, et. al.***
3 **Case No: 20STCV47287**
LWDA Case No: LWDA-CM-793145-20

4 I am employed in the State of California, County of Los Angeles. I am over the age of 18 and not
5 a party to the within suit; my business address is 333 South Hope Street, 40th Floor, Los Angeles, CA
90071.

6 On **May 16, 2024** I served true and correct copies the following document(s) described as:

7 **DECLARATION OF CARRIE PRODROMIDES IN SUPPORT OF HER MOTION FOR**
8 **FINAL APPROVAL OF CLASS ACTION AND PRIVATE ATTORNEY GENERAL ACT**
9 **SETTLEMENT**

on the interested parties in this action as follows:

10 Labor and Workforce Development Agency
11 800 Capital Mal, Suite 500
12 Sacramento, California 95814

13 ☒ **BY ELECTRONIC SUBMISSION:** Complying with CAL. LAB. CODE §§ 2699(I)(4) and
14 2699.3, I caused true and correct copies of the documents to be served on the Labor and
Workforce Development Agency through its online platform at
<https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>.

15 ☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct.

Executed on **May 16, 2024** at Los Angeles, California.

17
18 _____
19 Rolando J. Gutierrez
20 Type or Print Name

21
22 _____
23 
24 Signature