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Attorneys for Plaintiff and on behalf of the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

NATALIE PALMER, individually, on behalf
of all similarly situated current and former
employees, and on behalf of the State of
California and all Aggrieved Employees;

Plaintiff,

vs.

CHARTER HOSPICE, INC., a California
Corporation; CHARTER HOSPICE OF
COLTON, LLC, a California Limited
Liability Company; ARCH B. GILBERT, an
individual; FRED FRANK, an individual; and
DOES 1 through 10, inclusive;

Defendants.

Case No.: CIVDS2013037
*[Assigned to Hon. Judge David Cohn, Dept
S26, for all purposes]*

**DECLARATION OF PLAINTIFF
NATALIE PALMER IN SUPPORT OF
MOTION FOR FINAL APPROVAL**

I, Natalie Palmer, state and declare:

1. I am the named plaintiff and agreed to serve as the class representative and
PAGA representative in this matter. I am over 18 years of age. I have personal knowledge of the
facts set forth in this declaration and could and would testify competently thereto.

2. I was employed by Defendants in California from approximately March 2017
through June 4, 2020 as an in-home nurse.

1 3. My interests in this lawsuit are not in conflict or in any way antagonistic to the
2 interests of those of the other class members. At all times since the outset of this matter, I
3 understood that, as a class representative, I have a duty to look out for and protect the interest of
4 the class as a whole. I understand that the class includes all current and former non-exempt
5 employees employed by Defendants in California at any time between June 25, 2016 through the
6 entry of the Preliminary Approval Order.

7 4. I have taken my roll as a Class and PAGA representative very seriously. At all
8 times, I have been committed to remaining responsive to my counsel. I have devoted a
9 significant amount of time to this litigation and am willing to continue devoting time and effort
10 until the settlement is fully carrier out. For example, I spent significant time aiding the attorneys
11 in the development of the case, I frequently called and texted counsel to ensure they had all
12 necessary information, I spent significant time going over the facts and answering questions of
13 my attorney to aid in the preparation of the mediation brief, and I spent a whole day actively
14 participating by phone during the mediation. I have also spent significant amounts of time
15 gathering documents, reviewing pleadings, reviewing the mediation brief, and reviewing the
16 settlement agreement. My counsel has explained my duties as a Class representative, and I
17 understand them and have always complied. My efforts were instrumental in securing the
18 favorable terms of the settlement agreement. I also agreed to participate in this case with no
19 guarantee of personal benefit.

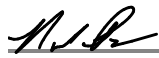
20 5. Although I did not keep contemporaneous time records for everything I did in
21 connection with this case, my conservative estimate is that I spent over 45 hours to date in
22 connection with this case.

23 6. I carefully reviewed the class action settlement agreement in this case before
24 signing it, and I understand its terms, including the total settlement amount of \$750,000.00, and
25 the deductions that will be taken from that before arriving at the net settlement fund, including
26 the attorneys' fees request of 1/3 of the gross amount plus actual costs up to \$15,000, the
27 settlement administration expenses, the PAGA allocation, and the nature of the class release. I
28 believe, along with my attorneys, that the settlement obtained is fair and reasonable to the class

1 members.

2 7. Additionally, I recognize that the parties have agreed to an incentive award of
3 \$5,000 to me for the time I spent on this case, in addition to my share of the settlement. In light
4 of what I have done for the class and the hard work we put in, I believe that the requested award
5 is fully warranted and respectfully request it be granted. Moreover, I voluntarily undertook a
6 great amount of risk by publishing my name and putting my time and reputation on the line to
7 represent the class. Further, I came forward to effectuate meaningful changes at the risk of
8 suffering retaliation in the industry, the possibility of being passed over for future jobs, and/or
9 being ordered to pay Defendant's costs. Regardless of these risks, I put the interests of the class
10 before mine. The incentive award I am requesting here represents less than 1% of the gross
11 settlement amount, which is not unreasonable considering the work I have put in. I also agreed to
12 represent the "aggrieved employees" in this case as a PAGA representative, which added
13 significant value to this case.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct. Executed on October 19, 2021, at Beaumont, California.

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17 By: 
18 Natalie Palmer (Oct 19, 2021 16:23 PDT)
19 Natalie Palmer, Declarant
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