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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

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

DAVID RUSSELL, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

DIGNITY HEALTH, a California
Corporation; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: CIVDS 2021522

*[Assigned to Hon. Joseph B. Widman, Dept S36,
for all purposes]*

**DECLARATION OF PLAINTIFF DAVID
RUSSELL**

I, David Russell, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. When I first retained my attorneys and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my own personal interests, (3) participating actively in the lawsuit, including potential

1 testimony at deposition and trial, and keeping generally aware of the status and progress of the
2 lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval
3 and must be designed in the best interests of the class as a whole.

4 3. Since first initiating this action on behalf of the proposed class, I believe that I
5 have more than adequately performed my duties as a class representative. I have been an active
6 participant in this litigation, including assisting my attorneys in various ways and making myself
7 available when needed. For example, I have assisted my attorneys by compiling and analyzing
8 substantial documentation regarding the claims in this case. I have also helped to explain and
9 discuss the company's practices and their general practices and procedures, locating and
10 analyzing company documents, among others. I have also reviewed all settlement documents and
11 believe that this settlement is fair for the class. Finally, I will continue to take all steps necessary
12 to finalize this settlement and obtain court approval.

13 4. I have no conflicts with the proposed class members, am an adequate and typical
14 class representative since I was subjected to the same company-wide practices in terms of
15 payment of vested vacation wages upon separation of employment, and will continue to assist
16 with the litigation and prosecute the case on behalf of the other employees.

17 5. I respectfully request that the court preliminarily approve the service award. As
18 outlined above, I have performed substantial services for the Class and helped obtain a beneficial
19 settlement for my fellow employees. At the final approval stage, I will submit an additional
20 declaration setting forth all the work I did for this case, including an estimated number of hours
21 spent assisting the Class and my attorneys.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct. Executed on Apr 21, 2026, at Highland, California.

24
25 *David Russell*
26 By: David Russell (Apr 21, 2026 13:48:20 PDT)
27 David Russell
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