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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 final 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. During my employment with Dignity Health, I thought that were issues with my pay and other aspects of my employment. Because of these issues, I started researching California law and contacted attorneys regarding how I was treated.

3. I then contacted my attorneys and understood that I had two options: (1) I could

bring a class action to help all of the employees, but I would have to put their interests ahead of my own, or (2) I could bring my individual case and claims and attempt to maximize my individual recovery. This decision was very difficult because I wanted to maximize my individual recovery, but I also wanted to help everyone else that was wronged by the company. And, if I brought a class action, I was worried that I might get labeled as a whistleblower, which might make it hard to find a job in the future. In the end, I decided that – despite the risks – it was important to bring these claims as a class action to hold the company accountable for how they treated their employees.

4. I respectfully request that the Court approve the agreed-upon service award for the following reasons.

5. *First*, I have spent substantial time working on this case – at least 80 hours engaged in activities to benefit the class over the more-than-5-years since we filed the class action. I have been an active participant in this litigation and have assisted my attorneys in numerous ways, including helping to explain and discuss the company's practices and their general practices and procedures, locating and analyzing company documents, and communicating with other class members. These efforts occurred through numerous telephone conferences, letters, emails, and text communications. I also assisted in preparation for mediation and helped obtain a positive result for the class. My work also continued after mediation, as I reviewed settlement agreements and other settlement documents, and continued communication with Class Counsel and other class members during the settlement approval processes.

6. *Second*, I respectfully request that the Court approve the agreed-upon service award because, as shown above, I agreed to set aside my personal interests and to put the interests of the class ahead of my own. In doing so, and by successfully bringing this case as a class action, I helped to obtain a highly beneficial settlement for the class members.

7. *Third*, by bringing this class action, I undertook significant risks and stresses at a high emotional cost without any guarantee of success. For example, filing this lawsuit and being a whistle blower was stressful on a day-to-day basis as I have constantly worried about the risk that this case could impact my ability to find future jobs. And this stress/risk lasted for the entire

case, and I'm still worried it may make it hard to find a job in the future.

8. *Fourth*, as a condition of this class action settlement, I was required to release and waive all possible individual claims against the company – something that none of the other class members were required to give up.

9. *Fifth*, bringing this case also came with a major financial risk because, if I lost the case, I would be required to pay the company's costs, which could be over $10,000, and there was a chance they could try to make me pay their attorneys' fees as well.

10. Therefore, I respectfully request that the Court award the full requested service award since that amount is justified based on the facts above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on Sep 8, 2026, at Highland, California.

By: David Russell (Sep 8, 2026 10:59:01 PDT)

David Russell