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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

CHRIS FARLEY, IRENE IMSON, SHELBY
WARD, and DARLENE GRIFFITH,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiff,

vs.

SHARP MEMORIAL HOSPITAL, a
California corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No. 37-2021-00006007-CU-OE-CTL

[Consolidated with Case No. 37-2021-
00047190-CU-OE-CTL]

**DECLARATION OF PLAINTIFF
IRENE IMSON IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: December 1, 2023
Hearing Time: 8:30 a.m.

Judge: Hon. Robert Longstreth
Dept: 65

Action Filed: February 9, 2021
Trial Date: Not set

1 I, IRENE IMSON, hereby declare as follows:

2 1. I am one of the plaintiffs in this action. All of the facts stated in this declaration
3 are based on my personal firsthand knowledge, unless another source of information or belief
4 clearly appears from the context, and as to all such matters I believe them to be true. If called as a
5 witness, I could and would competently testify to all facts stated in this declaration.

6 2. This declaration is submitted in support of Plaintiffs' Motion for Preliminary
7 Approval of Class Action Settlement.

8 3. I am a former employee of Sharp Memorial Hospital ("Sharp"). I worked for
9 Sharp as a Pharmacy Technician from June 1995 to around March 2021.

10 4. To date, I have spent over 30 hours on this case, including assisting my attorneys
11 with their investigation of the case, searching for and providing relevant documents to my
12 attorneys, reviewing documents, participating in numerous conversations with my attorneys,
13 reviewing and responding to written discovery and producing documents, preparing for and
14 testifying at a deposition which took place on August 23, 2022, preparing for and responding to
15 questions from my attorneys in preparation for the mediation, consulting with my attorneys
16 regarding the settlement, and reviewing the settlement agreement.

17 5. I fully realized the risks I would be taking by pursuing this class action as a named
18 plaintiff and class representative. I risked that prospective employers might conduct a
19 background check on me or otherwise find out about my participation in the lawsuit against
20 defendants and retaliate against me as a result. As a class representative, I knew I would be
21 bearing this risk that the absent class members would not be facing.

22 6. I also know that I placed myself at a substantial risk in the event Sharp were to
23 prevail in this action, because I could have been liable for its costs and attorneys' fees. Yet, I felt
24 so strongly about standing up for the rights of my fellow employees that I initiated and
25 participated in this lawsuit.

26 7. From the time I became a class representative in this case, I took an active role in
27 participating in decisions concerning the case, including settlement. I maintained regular contact
28 with my attorneys to provide them information and to keep myself informed of the developments

1 in the case. I made sure that I understood everything that was going on in the case so I could
2 make informed decisions on behalf of the class and myself.

3 8. I believe that the requested \$10,000.00 service award for serving as a class
4 representative is reasonable given the time and effort I have expended on behalf of the class and
5 the risks I faced in serving as a named plaintiff and class representative. Because I put myself on
6 the line, the class members did not have to expend their own time and resources to pursue legal
7 remedies individually.

8 9. In agreeing to be named as a plaintiff in this case, I placed the interests of other
9 class members ahead of my own interests by postponing the prosecution of my individual claims
10 and any recovery for myself alone so that the case could be litigated and resolved as a class
11 action, which benefitted the class as a whole and not just my interests. This action would not
12 have been possible without my active participation and willingness to place myself at risk for the
13 sake of the other class members. Without my efforts, the lawsuit would not have been brought
14 and maintained on behalf of the class.

15 10. Throughout the litigation, I did the best I could to represent the class and look out
16 for the class members' interests.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct. Executed on November 6, 2023, at Murrieta, California.

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Irene Imson (Nov 7, 2023 03:36 GMT+8)

21 IRENE IMSON
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