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Attorneys for Plaintiff, MARIA WONG-MIKHAIL,
on behalf of herself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

MARIA WONG-MIKHAIL on behalf of
herself and all others similarly situated,

Plaintiff,

SUTTER BAY MEDICAL FOUNDATION,
doing business as SUTTER HEALTH, a
California corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No. 21CV378378
ASSIGNED FOR ALL PURPOSES TO:
JUDGE: Hon. Theodore C. Zayner
DEPT: 19

**DECLARATION MARIA WONG-MIKHAIL
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA SETTLEMENT**

DECLARATION OF MARIA WONG-MIKHAIL

I, Maria Wong-Mikhail, declare as follows:

1. I am a Named Plaintiff and Class Representative in the case of *Maria Wong-Mikhail et al. v. Sutter Bay Medical Foundation, doing business as Sutter Health*, (Santa Clara County Superior Court Case No.21CV378378). I make this declaration on the basis of my personal knowledge and if asked to testify thereto I could and would do so.

2. I was employed by Defendant Sutter Bay Medical Foundation (“Sutter Bay” and/or “Defendant”) from on or about July 2016 through on or about February 10, 2020. During my employment with Sutter Bay, I occupied non-exempt, hourly positions. From on or about July 2016 until on or about September 2019, I was employed as a Pharmacist Technician. Thereafter, from on or about September 2019 until the last day of my employment, I was employed as a Patient Service Representative.

3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances that I had against Sutter Bay, I was made aware of the advantages and disadvantages of litigation. I was also made aware of my responsibilities as both a Plaintiff and a class and PAGA representative prior to filing the class action complaint which was filed on or about March 18, 2021. I accepted the responsibility and agreed to move forward. I pledged to participate actively in the lawsuit.

4. During the litigation of this case, I have continuously interacted with my attorneys to discuss the status of the case. I provided relevant oral and documentary information necessary to prosecute this case. By way of example, I searched for and provided relevant documents pertaining to my employment with Defendant and engaged in multiple discussions with my attorneys regarding my employment. These discussions include, but are not limited to, the following topics: the policies, practices and specific working conditions under Defendant. I have also had numerous discussions with my attorneys regarding the progress of this case. I have spent approximately 40 to 45 hours assisting my attorneys in their litigation of this case.

5. By agreeing to bring this action, I formally accepted the responsibilities of representing the interests of all similarly situated employees in California and willingly chose to

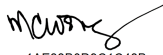
assume risks and potential costs that I alone might have to bear if judgement would have been rendered in favor of Defendant.

6 As part of the settlement agreement, I also signed a general release releasing all claims I have or may have against Sutter Bay which is far broader than the release by class members. The class representative service payment also serves as compensation for agreeing to a full, general release of all claims against Sutter Bay.

7 7. I have not directly experienced negative affect(s) in relation to any further employment opportunities because of this lawsuit. However, I also risked the potential stigma of being a named plaintiff in a representative action labor dispute which could affect my further employability in the industry or with any prospective employer who learns of my lawsuit against a former employer.

8 8. The class representative service payment, subject to court approval, is Ten Thousand Dollars (\$10,000). I believe that this amount is fair and reasonable in light of the risks undertaken (both personal and financial) in litigating this matter as a class action and PAGA representative, as well as the time and effort I have expended in doing so, which have resulted in a favorable outcome to the class members and aggrieved employees.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on August 20, 2025, at Modesto, California.

Signed by:

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 Maria Wong-Mikhail

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