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Attorneys for Plaintiff JESSICA MALDONADO, individually, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

JESSICA MALDONADO, individually, and
on behalf of other members of the general
public similarly situated

Plaintiff

v.

RADY CHILDREN'S PHYSICIAN
MANAGEMENT SERVICES, INC., a
California Corporation; RADY
CHILDREN'S HOSPITAL-SAN DIEGO, a
California Corporation; RADY
CHILDREN'S HOSPITAL AND HEALTH
CENTER, a California Corporation; and
DOES 1-10, inclusive.

Defendants

CASE NO. 37-2021-00014090-CU-OE-CTL

CLASS ACTION

**DECLARATION OF VALENCIA PLOOY
IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR FINAL
APPROVAL OF (1) CLASS ACTION
SETTLEMENT; (2) ATTORNEYS' FEES
AND COSTS; and (3) CLASS
REPRESENTATIVE AWARD**

Date: December 2, 2022

Time: 9:00 a.m.

Dept: C-73

Judge: Hon. Joel R. Wohlfeil

1 I, Valencia Plooy, hereby declare as follows:

- 2 1. I am the named Plaintiff in the above-captioned matter. I have personal knowledge of the facts
3 set forth in this declaration and if called to testify as a witness, I could and would do so. I make
4 this declaration in support of Plaintiff's Unopposed Motion for Final Approval of Class Action
5 Settlement, Attorneys Fees and Costs, and Class Representative Award.
- 6 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a
7 witness I could and would do so.
- 8 3. To my recollection, I personally met with my Attorneys (usually Mr. Sullivan) on at least 6
9 occasions. Several of those meetings lasted in excess of 2 hours.
- 10 4. During these meetings, I would review and explain certain documents numerous documents
11 turned over by Defendants from my employment and explain my role (as well as others) during
12 work. I also helped Mr. Sullivan identify numerous other employees who could support the
13 claims I was making in this lawsuit. I contacted many of these individuals myself to verify their
14 willingness to participate.
- 15 5. I also spoke with my attorneys on the phone, on at least 8 other occasions.
- 16 6. I agreed to have my deposition taken, and spent time prepping for it with my attorneys. I also
17 spent significant time reviewing the settlement documentation and discussing the settlement
18 with my attorneys.
- 19 7. In total, I estimate that I spent at least 30 hours related to the above mentioned tasks directly
20 working with my attorneys. I also spent at least another 4-5 hours of my own time gathering
21 evidence and outlining issues that I later shared with my attorneys.
- 22 8. I was counseled by my attorneys, when I decided to move forward with this case, of the
23 potential stigma of being a Class Representative in a class action dispute, as this is a publicly
24 filed lawsuit.
- 25 9. I was also advised that once I joined this case, and, had we lost, I could have been personally
26 liable for paying all of Defendants' costs. I was further advised this could be well into the tens
27 of thousands of dollars on this type of case.

1 10. Despite these risks I was committed to achieving a settlement that would benefit all employees
2 working for Rady.
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4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. Executed this 4th day of November, 2022 at San Diego, California.
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9 VALENCIA PLOOY
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