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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

MARY JANE HINKLE, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

ALAMEDA HEALTHCARE &
WELLNESS CENTER, LLC, a California
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: RG21090402

(Assigned to the Honorable Noël Wise, Dept. 21)

**DECLARATION OF MARY JANE HINKLE
IN SUPPORT OF PLAINTIFF'S MOTION
TO APPROVE SETTLEMENT
AGREEMENT PURSUANT TO THE
PRIVATE ATTORNEYS GENERAL ACT OF
2004**

Date: September 10, 2024
Time: 1:30 P.M.
Dept.: 21

Reservation ID: 679065050734

Action Filed: March 2, 2021
Trial Date: Not Set

DECLARATION OF MARY JANE HINKLE

I, Mary Jane Hinkle, declare as follows:

1. I am an individual over the age of 18. I am the named Plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. This declaration is submitted in support of Plaintiff's Motion to Approve the Settlement Agreement Pursuant to the Private Attorneys General Act of 2004.

3. I was employed by Defendant Alameda Healthcare & Wellness Center, LLC ("Defendant") as a Certified Nursing Assistant from about February 2017, until about February 23, 2020. I worked at Defendant's rehabilitation center.

4. During my employment with Defendant, I allege that I did not receive meal breaks of at least 30 minutes for shifts of 5 hours or longer and rest breaks of at least 10 minutes for shifts of 3.5 hours or longer. I was not paid premium compensation in lieu of receiving proper meal and rest breaks.

5. Throughout my employment, I regularly worked overtime and double time hours. I believe I was not properly paid all overtime and/or double time owed.

6. As a result of the nonpayment/underpayment of wages, the wage statements I received did not display accurate gross and net wages earned, hourly rates of pay, and total hours worked.

7. Following my employment with Defendant, I also filed a charge with the Department of Fair Employment & Housing regarding harassment I contended I experienced during my employment with Defendant.

8. After my attorneys filed my lawsuit in this case, the case was sent to arbitration. I assisted my attorneys in providing background regarding the circumstances surrounding my employer requiring me to sign an arbitration agreement in addition to the general conditions of my employment. During the arbitration process, I provided documents and information to my lawyers to produce in the case. I also communicated regularly with them to get updates and to provide additional information, including, but not limited to, providing information regarding

potential witnesses, contact information for the same, and collecting documents that I believed supported my case.

9. I understand that this action was prosecuted on behalf of the State of California as a private attorney general. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including speaking with them, providing them with documents and information, discussing Defendant's policies and procedures, and reviewing filings and the notices to the Labor and Workforce Development Agency.

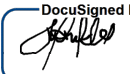
10. This case started in the beginning of 2021, and I have spent countless hours assisting my attorneys with this case. I estimate that I spent at least 40-45 hours meeting and/or conferring with my attorneys, helping my attorneys prosecute the claims in this lawsuit.

11. Throughout this case, I have been kept apprised of the status of this case.

12. I believe that the settlement is fair, adequate, and reasonable for employees and the State of California. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people and the State of California will benefit because of the actions that I have taken.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 13 day of August 2024, at Alameda, California.

DocuSigned by:

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 Mary Jane Hinkle