

1 Shaun Setareh (SBN 204514)
shaun@setarehlaw.com, calendar@setarehlaw.com
2 Eric Y. Hahn (SBN 311771)
eric@setarehlaw.com
3 Victoria Mas (SBN 365896)
vmas@setarehlaw.com
4 SETAREH LAW GROUP
420 N. Camden Drive
5 Beverly Hills, California 90210
Telephone (310) 888-7771
6 Facsimile (310) 888-0109

7 Attorneys for Plaintiff GIL MICHAELI
8
9

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF MADERA**

12 JASON NASR, JACK SAMONTE, GIL
13 MICHAELI, and MYESHA WILLIAMS, as
14 individuals and on behalf of all others
similarly situated, and as private attorneys
general,

15 Plaintiffs,

16 vs.
17

18 SAN JOAQUIN VALLEY
REHABILITATION HOSPITAL, a Delaware
19 limited liability company; and DOES 1
through 50, inclusive,
20

21 Defendants.
22
23
24
25
26
27
28

Case No. MCV084862

[Assigned to Hon. Michael Jurkovich, Dept. 44]

**DECLARATION OF GIL MICHAELI IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: May 28, 2026
Time: TBD
Department: Temporary Remote Department

Complaint Filed: March 16, 2021
FAC Filed: May 6, 2021
SAC Filed: May 22, 2025

DECLARATION OF GIL MICHAELI

1. I, GIL MICHAELI, declare that I am over the age of 18 and a party to this action. I have personal knowledge of the matters set forth in this declaration, except as to those matters stated on information and belief, and as to those matters I believe them to be true. If called upon as a witness, I could and would testify competently to them.

2. I make this statement voluntarily. No threats or promises have been made to me, nor have any benefits of any kind been offered or given as a result of my decision to make this statement.

3. I am willing and able to serve as a class representative in this matter.

4. I understand this case was filed as a class action and that I am attempting to represent other employees of Vibra Healthcare LLC; Vibra Rehabilitation Hospital of Rancho, LLC d/b/a Vibra Rehabilitation Hospital of Rancho Mirage; San Joaquin Valley Rehabilitation Hospital; 1125 Sir Francis Drake Boulevard Operating Company, LLC d/b/a Kentfield Hospital; Kentfield Rehabilitation Hospital Foundation; Gale Healthcare Solutions LLC; and Realtime PEO II, LLC ("Defendants"). As a class representative, I understand that I have fiduciary duties to the class, including holding their interest above my own and assisting counsel in this case. I am willing and able to do so.

5. I have no conflict with the class and no conflict with class counsel.

6. I understand that the attorney Shaun Setareh may submit this declaration to the Court in support of the class action lawsuit brought against Defendants on my behalf, and all others similarly situated.

7. I was employed by Defendants in the State of California as a non-exempt, hourly employee.

8. Shortly after my employment with Defendants ended, I researched law firms and found Setareh Law Group. I contacted them because they seemed experienced in employment law. After reaching out to them initially, I spoke with someone at the firm about my background, my employment history, and my work as an employee of Defendants. I provided documents and information to the firm and answered any questions that were asked to me.

1 9. I reviewed and signed a representation agreement with Setareh Law Group.

2 10. I decided that being a named plaintiff in this Action was the right thing to do in order
3 to make sure that other employees and former employees were able to get some recovery for what I
4 believed were unfair employment practices.

5 11. After the case was filed, I had multiple calls with my lawyers who provided updates
6 on a regular basis.

7 12. Once the Parties reached an agreement, I was happy with the amount of the
8 settlement for the class members.

9 13. In total, I would estimate that I spent over twenty (25) hours of time related to this
10 action.

11 14. I understand that as a Class Representative I have an important duty to look out for
12 the best interests of the Class. I understood from the start of considering this case based on my
13 discussions with my lawyers that I would have to take on significant responsibilities and burdens for
14 the benefit of the Class, which could include having my deposition taken to give testimony under
15 oath, that I could face the possibility of subpoenas being issued, and that I may testify in Court for
16 the benefit of not only myself but the other members of the Class.

17 15. Further, my counsel have advised me of the possibility that, if the case was lost, I
18 could have been ordered to pay Defendant's costs and even attorneys' fees in this case, which could
19 have been thousands of dollars by the end.

20 16. Because I filed this lawsuit, there is a public record at the Court showing that I
21 brought a class action lawsuit against my former employer. The payment to me of the requested
22 enhancement award is not equal to the harm to my future career prospects that this case may cause
23 me.

24 17. I have taken my responsibility as a Class Representative seriously and will continue
25 to do so.

26 18. I know of no conflicts between my interests and goals and the interests and goals of
27 anyone else in the Class.

28 19. I believe that I had a similar experience compared to the other Class Members.

20. Based on my efforts in this case, finding a lawyer, organizing and providing numerous documents to my lawyer that were very helpful to the case, numerous calls and emails with my lawyer, being named as a plaintiff in a lawsuit, my participation in the lawsuit as summarized above, and the settlement we were able to achieve, I believe the requested incentive payment is appropriate.

21. I remain committed to prosecuting the claims in this case.

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

Executed on 4/23/2026 at San Geronimo, California.

Gil Michaeli

ID UbJfg7ksx7rj5bd5HXNv8r44

GIL MICHAELI