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

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

Plaintiffs,

vs.

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

Defendants.

Case No. MCV084862

Hon. Michael J. Jurkovich
Dept. 44

**DECLARATION OF MYESHA WILLIAMS
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: May 28, 2026

Time: 8:30 a.m.

Dept.: Temporary Remote Dept.

Complaint Filed: March 16, 2021

FAC Filed: May 6, 2021

SAC Filed: May 22, 2025

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DECLARATION OF MYESHA WILLIAMS

I, Myesha Williams, hereby declare as follows:

1. I am a named plaintiff and representative of the Aggrieved Employees in the above-captioned matter ("Action"). I am over the age of 18. The following statements are based on my personal knowledge. If called upon to testify as to the matters stated herein, I could and would do so competently.

2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement ("Motion").

3. I was employed by Defendant Vibra Healthcare LLC ("Vibra") through a staffing agency, Gale Healthcare Solutions, LLC ("Gale") (collectively "Defendants") as a licensed Vocational Nurse at Vibra Rehabilitation Hospital from December 2019 to November 2020 in Rancho Mirage, California.

4. I experienced issues during my employment with Defendants, including being required to skip my meal and rest periods, take my meal and rest periods late, or cut my meal and rest periods short. Additionally, I often worked in excess of eight (8) hours a day, and forty (40) hours in a week, and was not compensated for overtime or time worked off-the-clock. Additionally, Defendants improperly charged me check preparation fees in order to receive my pay stubs.

5. Schneider Wallace Cottrell Kim LLP ("SWCK") is representing me in this case.

6. There is no conflict between me and the Aggrieved Employees. My claims are in line with those of the Aggrieved Employees and I have prosecuted this case with the interests of the Aggrieved Employees in mind. I have met with my attorneys, conducted interviews regarding my work experiences, and participated in class and PAGA-wide settlement decisions.

7. I have also selected counsel with extensive experience in class action and employment litigation, including wage and hour class and PAGA actions. For these reasons, I am an adequate representative of the Aggrieved Employees.

8. Prior to the filing of this action, I had multiple telephone conversations with my attorneys about my work experiences and possible claims.

9. I knew there was no guarantee we would be successful in the case and that there was a significant chance of protracted litigation. I was, and am, concerned that my participation in the lawsuit could deter potential future employers from hiring me. I also understood that I may have had to spend a

significant amount of time in the discovery process and potentially be deposed.

10. I have substantially contributed my time and efforts to my counsel in this case. For a period of approximately five years since I joined this lawsuit, I communicated frequently with my attorneys. In order to provide factual background for the Complaint, it was necessary for me to recall and memorialize events from my employment with Defendant, participate in multiple interviews, produce documents and be available for follow up calls, emails and text messages from my attorneys. I worked with my attorneys to review facts and answer questions so they can draft the Complaint in the Action.

11. In sum, I had numerous discussions with my counsel, worked with my counsel to review facts and answer questions, assisted my counsel in their mediation efforts, and have generally remained apprised of the case. I also reviewed the proposed Settlement to understand its legal effect.

12. Further, in agreeing to serve as PAGA representative, I formally agreed to accept the responsibilities of representing the interests of all Aggrieved Employees and the risks of having my name associated with a wage-and-hour action.

Executed on 05 / 05 / 2026 in Winchester, CA, California.



Myesha Williams

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STATE OF CALIFORNIA]
COUNTY OF LOS ANGELES]ss.

On May 5, 2026, I served the following document(s) described as: **DECLARATION OF MYESHA WILLIAMS IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** on the interested parties in this action as follows:

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4 X BY ELECTRONIC SERVICE: Based on a court order I caused the above-
5 entitled document(s) to be served through the ACE E-Filing System at the website
6 www.efile.acelegal.com, addressed to all parties appearing on the electronic service list for the
7 above-entitled case. The service transmission was reported as complete and a copy of the filing
8 receipt/confirmation will be filed, deposited, or maintained with the original document(s) in this
9 office.

10 I declare under penalty of perjury under the laws of the State of California that the above
11 is true and correct. Executed on May 5, 2026, at Los Angeles, California.

12 
13 Erika Mejia