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Attorneys for Plaintiffs

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

CIARA LEWIS, individually, and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

SALUS HEALTHCARE, LLC, a California
limited liability company; ASPEN
HEALTHCARE CORPORATION, an
unknown business entity; SALUS HOSPICE,
LLC, a California limited liability company;
SALUS HOME HEALTH, an unknown
business entity; and DOES 1 through 100,
inclusive

Defendants.

LADONIA WHITE, individually, and on
behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act,

Plaintiff,

vs.

LOS ANGELES HOMECARE LLC, a
California limited liability company;
SALUS HOME HEALTH AND HOSPICE,
INC., a California corporation, SALUS
HEALTHCARE, LLC, a California limited
liability company; SALUS HOMECARE
LLC, an unknown business entity, MARK
MORTENSEN, an individual; and DOES 1
through 100, inclusive,

Defendants.

Case No. 30-2021-01213154-CU-OE-CXC
(Consolidated with Case No. 30-2024-
01436416-CU-OE-CXC)

Honorable Layne H. Melzer
Department CX-102

CLASS ACTION

**DECLARATION OF LADONIA
WHITE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LABOR CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT**

Reservation ID: 74821145
Hearing Date: August 13, 2026
Hearing Time: 2:00 p.m.
Department: CX-102

Lewis Action Filed: July 27, 2021
White Action Filed: October 30, 2024
Trial Date: None Set

DECLARATION OF LADONIA WHITE

I, Ladonia White, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the action entitled *White v. Salus Healthcare, LLC, et al.*, Orange County Superior Court, Case No. 30-2024-01436416-CU-OE-CXC, which was consolidated into the lead action entitled *Lewis v. Salus Healthcare, LLC, et al.*, Orange County Superior Court, Case No. 30-2021-01213154-CU-OE-CXC. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Salus Homecare LLC (who along with Salus Healthcare, LLC, Aspen Healthcare Corporation, Salus Hospice, LLC, Salus Home Health, Los Angeles Homecare, LLC, Salus Home Health and Hospice, Inc., Salus Homecare, and Mark Mortensen are collectively referred to as the "Defendants") from approximately March 2023 to the present as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, and a PAGA representative, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

1 4. Throughout this matter, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to them
3 as quickly as possible and gave them as much information and identified as many documents as I
4 could. I spent time speaking with my attorneys about the case, identifying potential witnesses,
5 providing my attorneys with documents and information concerning the case, and also describing
6 policies, practices, and procedures of Defendants.

7 5. As far as the settlement is concerned, I was available to review documents and
8 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
9 Settlement Agreement and discussed the questions I had regarding the potential settlement with my
10 attorneys before signing the settlement papers.

11 6. I understand that a settlement has been reached in my case and what my duties and
12 responsibilities are as a PAGA representative. I also understand that my duties will include
13 checking in on, monitoring, and conferring with my attorneys to provide information that the Court
14 needs in order to assess whether the settlement is fair, reasonable, and adequate.

15 7. I believe that I have done everything that my attorneys have asked of me and have
16 tried, to the best of my ability, to represent pursue relief on behalf of the State of California with
17 respect to aggrieved employees. I have volunteered to represent and champion the interests of
18 many other people with similar claims and injuries because of the importance of the cases and the
19 necessity that all aggrieved employees benefit from the lawsuits equally. I have participated, and
20 continue to participate, in the lawsuit as necessary. I have actively followed and monitored the
21 progress of the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the
22 skilled and effective attorneys that I have retained.

23 8. I think my efforts helped to get the result obtained in this matter, and as a PAGA
24 representative, I respectfully request that the Court award me a general release fee for my efforts in
25 pursuing and participating in this matter, as well as my broader release of claims. Taking into
26 consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

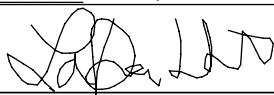
27 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

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1 10. I have not entered into any undisclosed agreements, nor have I received any
2 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
3 the Court awards as a general release fee, as well as my share of the settlement as an aggrieved
4 employee.

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

7 Executed on this 03/03/2026 day of 2026, at Los Angeles, California.

8 
9 Electronically Signed 2026-03-03 23:43:39 UTC - 172.58.209.187
Nintex AssureSign® 9bb702ea-4975-4be2-b5d7-b402017a188b

Ladonia White