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16 *[Additional Counsel on Next Page]*

17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

18 **IN AND FOR THE COUNTY OF SAN BERNARDINO**

19 CHRISTINA ABDELMALAK and PAZ
20 SALVADOR, on behalf of all Aggrieved
21 Employees and the State of California;

22 Plaintiff,

23 vs.

24 PRIME HEALTHCARE ANAHEIM, LLC, a
25 Delaware Limited Liability Company; and
26 DOES 1 through 20, inclusive;

27 Defendants.

Case No. CIVSB2127232

*[Assigned to Hon. Joseph Ortiz, Dept S17 for
all purposes]*

**DECLARATION OF PAZ SALVADOR IN
SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT**

Hearing

Date: January 7, 2026

Time: 1:30 p.m.

Dept.: S17

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16 Attorneys for Plaintiffs and Aggrieved Employees

1 I, Paz Salvador, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration,
3 and I am making this declaration on behalf of myself, as a named plaintiff, and in support of the
4 Motion to Approve Private Attorneys General Act Settlement.

5 2. I worked in California as a non-exempt employee of Defendant Prime Healthcare
6 Anaheim, LLC ("Defendant") from approximately 1980 to June 5, 2021.

7 3. I retained my attorneys who are experienced in PAGA representative action
8 litigation and claims against employers for violations of the California Labor Code. I have no
9 personal relationship or family ties to my attorneys or any officer of the Court. I am not aware of
10 having any actual or potential conflicts of interest with another PAGA Member in this case nor am
11 I aware of having any actual or potential conflicts of interest with the settlement administrator in
12 this matter.

13 4. I was subject to Defendant's policies and practices that have been alleged as
14 unlawful in the Complaint and the PAGA notice sent to the Labor and Workforce Development
15 Agency. For example, I was forced to work off the clock as Defendant required me to perform a
16 variety of tasks before clocking in and after clocking out, and also forced me to wait in lines to
17 clock in for my shift. Additionally, I did not always receive compliant meal and rest breaks, which
18 were often late, short, interrupted, or missed entirely – and when these violations occurred, I did
19 not receive all break penalty payments I was entitled to. This was because Defendant did not have
20 enough staff scheduled to permit employees to take compliant breaks, as we could not take our
21 breaks when caring for patients, or performing similarly time-sensitive tasks. Further, I was not
22 reimbursed for the cost of my personal cell phone, which was used to carry out job duties for
23 Defendant.

24 5. In bringing this case for myself, the State of California, and the other employees, I
25 understood a lot of work would be required and I was willing to, and did, do the work to keep the
26 case moving forward. For instance, before the complaint was filed I spoke to my attorneys several
27 times and discussed how Defendant implemented its company policies and procedures. I also
28 assisted my attorneys in their investigation into my claims by providing them documents and

1 answering their questions. I reviewed the complaint before it was filed and after it was filed, I was
2 given access to an electronic file sharing program that alerted me via email when important
3 documents were filed so that I could review them and keep up with the developments in the case.

4 6. My attorneys explained to me the risks and benefits of bringing a representative
5 action. I understood that I took on the risk, both professionally and financially, in pursuing the case
6 as a representative PAGA action.

7 7. A mediation took place on May 27, 2025 with Marc Feder, a well-respected and
8 experienced wage and hour mediator. The mediation resulted in an agreement to settle the action. I
9 communicated with my attorneys regarding the terms of the settlement which was reached between
10 the parties and understood that the recovery in this case was for the benefit of my fellow coworkers,
11 not just for me, and therefore wanted the best possible result to be obtained for the PAGA Members.
12 I reviewed and signed the PAGA Settlement on October 10, 2025.

13 8. I have been actively involved with this lawsuit. Although I did not keep time
14 records, I was in regular contact with my attorneys, reviewed court filings, and spent a significant
15 amount of time on the issues presented during the lawsuit and in the settlement process. I estimate
16 that I spent approximately 30-40 hours working on this case up until this point.

17 9. I reviewed the final PAGA Settlement Agreement, and I believe it is fair and
18 reasonable given the facts of the case.

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

21 Executed on 12/08/2025, at 20431 Via Navarra, Yorba Linda, CA.
22 (date) (city, state)

23 Paz E. Salvador

Paz E. Salvador (Dec 8, 2025 15:12:31 PST)

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