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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

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

Plaintiff,

vs.

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

Defendants.

Case No.: CIVSB2127232

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

**DECLARATION OF CHRISTINA
ABDELMALAK IN SUPPORT OF
PLAINTIFFS' MOTION TO APPROVE
PAGA SETTLEMENT**

DECLARATION OF CHRISTINA ABDELMALAK

I, Christina Abdelmalak, state and declare:

1. I am the Plaintiff in the above-captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for approval of the PAGA settlement.

2. I believe the settlement is fair and reasonable and constitutes a just resolution of the alleged claims.

3. During my employment with Defendant, several issues concerned me, which I believed did not comply with California law, including: failure to pay all minimum and overtime wages; failure to provide proper meal and rest periods; failure to timely pay wages; failure to timely pay final wages; wage statement violations; and failure to provide accurate itemized wage statements. Even though I was unsure about bringing a lawsuit—due to the risk of stepping forward as a whistleblower and the potential harm to my career—I decided to proceed because I believed other employees and I were not being treated properly.

4. When I retained my attorneys and chose to pursue this case as a PAGA representative, I understood that I had specific responsibilities, including: (a) representing the interests of all aggrieved employees; (b) placing those interests above my own; (c) actively participating in the case, including sitting for a deposition and staying informed about the lawsuit's progress; and (d) ensuring that any resolution would require court approval and must benefit all aggrieved employees as a whole.

5. I respectfully request that the Court approve the requested service award of \$10,000 in recognition of my time, efforts, and the risks I undertook in pursuing this matter on behalf of the State of California and other aggrieved employees.

6. First, I devoted substantial time to this case and provided significant services to help secure a beneficial settlement for my fellow employees.

7. On or about October 4, 2021, I initiated this action in the Superior Court of California, San Bernardino County, to represent my interests and those of similarly aggrieved employees.

8. Since initiating this action, I estimate I have spent approximately 45–50 hours helping to advance the case, including explaining and discussing company practices, locating and analyzing documents, and communicating with other aggrieved employees. These efforts involved meetings, phone calls, letters, emails, and texts with my attorneys. I also spent substantial time assisting in advancing the arbitration and preparation for mediation.

9. My work did not end at mediation. I reviewed the settlement agreement and related documents and remained in contact with my attorneys during the settlement approval process.

10. Second, I put the interests of other aggrieved employees ahead of or on par with my own throughout this litigation, helping to achieve a strong result for others through my role as the PAGA representative.

11. Third, unlike other aggrieved employees, I was required to release and waive any potential individual claims against Defendant as a condition of this settlement.

12. Fourth, pursuing this case as a PAGA representative came with significant emotional and professional risks. It was extremely stressful to file a lawsuit and take on the role of a whistleblower, knowing this could negatively impact my future job prospects—especially given the public nature of court records.

13. Fifth, bringing this action also exposed me to financial risk, including the possibility that I could be responsible for Defendant's litigation costs or even attorneys' fees if the case were unsuccessful.

14. I affirm my continued commitment to the interests of the aggrieved employees. I took on meaningful risks and expended considerable effort to help secure this outcome. I respectfully request that the Court approve the proposed \$10,000 Service Award in recognition of these contributions.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 12/3/2025, at 18:00, California.

DocuSigned by:
Christina Abdelmalak
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