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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

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

Plaintiff,

vs.

LIGHTBRIDGE HOSPICE, LLC, a
California limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 37-2021-00041128-CU-OE-CTL

Honorable Loren G. Freestone
Department: C-64

**DECLARATION OF SARAH CABLES IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LABOR CODE § 2698,
ET SEQ.) SETTLEMENT AGREEMENT AND
AWARD OF PAGA COUNSEL FEES
PAYMENT AND PAGA COUNSEL
LITIGATION EXPENSES PAYMENT,
SERVICE AWARD, AND ADMINISTRATION
EXPENSES PAYMENT**

[Notice of Motion and Motion for Approval of
Private Attorneys General Act (Cal. Labor Code §
2698, *Et Seq.*) Settlement Agreement and Award of
PAGA Counsel Fees Payment and PAGA Counsel
Litigation Expenses Payment, Service Award, and
Administration Expenses Payment; Declaration of
PAGA Counsel (Joanna Ghosh); and [Proposed]
Order and Judgment filed concurrently herewith]

Date: August 9, 2024
Time: 10:30 a.m.
Department: C-64

Complaint Filed: September 27, 2021
Trial Date: None Set

DECLARATION OF SARAH CABLES

I, **Sarah Cables**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case, and 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 Defendant LightBridge Hospice, LLC. ("LightBridge") from approximately September 2019 through March 2020 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences at LightBridge and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure LightBridge was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 6 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost 7 hours discussing my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a PAGA action.

3. Since becoming involved in this matter, I have spent over 22 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included providing documents concerning my employment with LightBridge, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from LightBridge. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

4. Throughout my involvement in this case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could. I spent at least 15 hours speaking with my attorneys about the case, sending them documents,

1 identifying potential witnesses, and also describing policies, practices, and procedures of
2 LightBridge.

3 5. I spent about 3 hours reviewing the settlement agreement and about 3 hours
4 asking questions and discussing the potential settlement with my attorneys before signing the
5 settlement agreement.

6 6. I believe that I have done everything that my attorneys have asked of me and
7 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
8 California. I think my efforts helped to get the result obtained in this case.

9 7. I respectfully request that the Court approve and award me a service payment in
10 the amount of \$7,500.00 for my efforts and active participation in the case and broader release of
11 claims. Taking into consideration the time that I dedicated to this case, I believe that this amount
12 is reasonable.

13 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

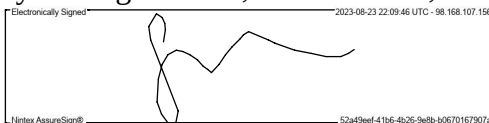
14 9. I have not entered into any undisclosed agreements, nor have I received any
15 undisclosed compensation in this case. The only compensation I will receive is an enhancement
16 payment, if approved by the Court, as well as my share of the settlement as an aggrieved
17 employee.

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

08/23/2023

20 Executed this ____ day of August 2023, at Escondido, California.

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The image shows a rectangular box containing an electronic signature. The signature is a cursive-style name, likely 'Sarah Cables'. Above the signature, the text 'Electronically Signed' is visible. To the right of the signature, there is a timestamp '2023-08-23 22:09:46 UTC - 98 168.107.156'. Below the signature, there is a long alphanumeric string '52a49eef-41b6-4b26-9e8b-b0670167907a'.

Sarah Cables