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

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

Plaintiff,

vs.

DESERT MEDICAL GROUP, INC., a  
California corporation; and DOES 1 through  
100, inclusive,

Defendants.

Case No.: CVPS2104875

Honorable Harold W. Hopp  
Department 1

**DECLARATION OF STEPHANIE MCCOY  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR APPROVAL OF PRIVATE  
ATTORNEYS GENERAL ACT (CAL.  
LABOR CODE § 2698, ET SEQ.)  
SETTLEMENT AGREEMENT AND  
AWARD OF ATTORNEYS' FEES AND  
COSTS, GENERAL RELEASE FEE, AND  
SETTLEMENT ADMINISTRATION  
COSTS**

[Notice of Motion and Motion for Approval of  
Private Attorneys General Act (Cal. Labor  
Code § 2698, *Et Seq.*) Settlement Agreement  
and Award of Attorneys' Fees and Costs,  
General Release Fee, and Settlement  
Administration Costs; Declaration of Plaintiff's  
Counsel (Joanna Ghosh); and [Proposed] Order  
and Judgment filed concurrently herewith]

Date: July 22, 2024  
Time: 8:30 a.m.  
Department: 1

Complaint Filed: September 21, 2021  
Trial Date: None Set

**DECLARATION OF STEPHANIE MCCOY**

I, **Stephanie McCoy**, 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 Desert Medical Group, Inc. ("Desert Medical") from approximately February 2020 to approximately April 2020 and also from approximately September 2020 to approximately November 2020 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences at Desert Medical 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 Desert Medical 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 10 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost 9 hours discussing my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA") generally, and what it meant to bring a PAGA action.

3. I have spent over 21 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included gathering and providing documents concerning my employment with Desert Medical, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Desert Medical. 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. As the case progressed, 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

1    them as quickly as possible and gave them as much information as I could.  
2    I spent at least 20 additional hours speaking with my attorneys about the case, sending them  
3    documents, identifying potential witnesses, and also describing policies, practices, and  
4    procedures of Desert Medical.

5            5.    As far as the settlement is concerned, I was able to review documents and answer  
6    any questions my attorneys had. I spent about 4 hours reviewing the settlement papers and about  
7    3 hours asking questions and discussing the potential settlement with my attorneys before  
8    signing the settlement agreement.

9            6.    I have not entered into any undisclosed agreements, nor have I received any  
10    undisclosed compensation in this case. The only compensation I will receive is a general release  
11    fee, if approved by the Court, as well as my share of the settlement as an aggrieved employee.

12           7.    I fully understand the risk I faced in serving as a PAGA representative and that  
13    doing so could make the cases more complex. However, I do so to ensure that not only myself,  
14    but other aggrieved employees, would be able to receive what they were owed.

15           8.    Since joining this lawsuit, I have considered the interests of the aggrieved  
16    employees just as I would consider my own interests. I understand and have understood  
17    throughout the lawsuit that I must put the interests of the aggrieved employees and the State of  
18    California before my own interests. Although I was concerned and afraid about being the PAGA  
19    Representative in this public lawsuit, I decided to put my own interests aside and bring a lawsuit  
20    that would be beneficial not just for myself, but for all aggrieved employees. To the best of my  
21    knowledge, I have not yet suffered any adverse consequences as a result of this lawsuit, but  
22    neither have I received any benefit for being a PAGA Representative or for the help I provided  
23    my attorneys. As of this date, I have not incurred any expenses to further prosecution of these  
24    actions.

25           9.    Further, as part of the Settlement, I have agreed to a much broader individual  
26    release than that agreed to by the State of California on behalf of the aggrieved employees. This  
27    release encompasses all claims I have against the Released Parties, arising at any time up to and  
28    including the effective date.

10. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case. I respectfully request that the Court approve and award me a general release fee in the amount of \$10,000.00 for my efforts and active participation in the case and broader release of claims. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

11. As of this date, I am the named plaintiff in one (1) other pending PAGA case entitled *Stephanie McCoy v. VBR BHS Management, LLC*, Riverside Superior Court Case No. CVRI2104222.

12. Other than the above-mentioned action, there are no other PAGA cases, pending or closed, in which I am or was the named plaintiff.

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

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

06/27/2024

Executed this \_\_\_\_ day of June 2024, at Desert Hot Springs, California.

Electronically Signed 2024-06-27 16:37:29 UTC - 146.75.146.78  
Nintex AssureSign® 44bdcfb1-77b4-4d32-b9e5-b19b014f3507

Stephanie McCoy