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Attorneys for Plaintiff WINIFRED ALLISON,
 on behalf of herself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF LOS ANGELES**

LAURA LOPEZ, as an individual and on behalf
 of all others similarly situated,

Plaintiff,

vs.

BARLOW RESPIRATORY HOSPITAL, a
 California corporation; and DOES 1 through
 100,

Defendants.

Case No.: 22STCV03831

Lead Case No.: 21STCV29754

CLASS ACTION

*[Assigned for all purposes to the Hon. Carolyn
 B. Kuhl, Dept. S-12]*

**DECLARATION OF WINIFRED
 ALLISON IN SUPPORT OF
 PRELIMINARY APPROVAL OF CLASS
 ACTION SETTLEMENT**

I, Winifred Allison, declare:

1. I am over the age of 18 and am the named Plaintiff and class representative in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. This declaration is submitted in support of Preliminary Approval of the Class Action settlement in this matter.

3. I worked for Defendant Barlow Respiratory Hospital from approximately June 2007 until on or around August 13, 2021, as an hourly non-exempt employee in California.

**DECLARATION OF WINIFRED ALLISON IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS
 ACTION SETTLEMENT**

1 4. From the time of the filing of the lawsuit, I have understood that this is a class
2 action lawsuit where I represent the interests of all current and former hourly non-exempt
3 employees of Defendant in California at any time during the relevant time period.

4 5. I believe while working for Defendant, I and all current and former hourly non-
5 exempt employees of Defendant in California at any time during the period from February 15,
6 2017, through and including August 1, 2023, were subject to the same policies and procedures
7 regarding payment of minimum wages and overtime wages, meal periods, rest periods, and wage
8 statements. I believe that the claims of all current and former hourly non-exempt employees of
9 Defendant in California at any time during the period from February 15, 2017, through and
10 including February 27, 2024, are identical to mine because Defendant's policies and procedures
11 applied to all employees.

12 6. I understand that I must continue to consider and protect the interests of all current
13 and former hourly non-exempt employees of Defendant in California at any time during the period
14 from February 15, 2017, through and including February 27, 2024. I have been protecting the
15 rights of myself and all current and former hourly non-exempt employees of Defendant in
16 California at any time during the period from February 15, 2017, through and including February
17 27, 2024, since approximately November of 2021 when first I started looking for an attorney
18 before this lawsuit was filed. I have been and continue to place the interest of all current and
19 former hourly non-exempt employees of Defendant in California at any time during the period
20 from February 15, 2017, through and including August 1, 2023, above my own.

21 7. I provided information and have been available to my attorneys since
22 approximately November of 2021 when I was searching for my attorney. I have helped and been
23 willing to support the lawsuit in any way I can for the last approximately 30 months since
24 November of 2021 when I began searching for an attorney for the claims in this lawsuit. I have
25 searched for an attorney, met with my attorneys to see if they would represent me, met with my
26 attorneys to discuss the Defendant's policies, procedures, and practices for the hours worked at
27 Defendant. I spent time searching for policies and procedures that were given to me during my
28

1 employment, any timecards I had, any pay stubs I had, W2s, handbooks and other documents
2 related to my employment. I produced all the documents to my attorneys. I responded to almost all
3 of my attorneys' telephone calls and I met with them telephonically to discuss any questions they
4 had about my employment, Defendant's policies and procedures, or the documents I had provided
5 to them. I was also available during the full day mediation in this case. Once the settlement
6 agreement was finalized, I conversed with my attorneys on multiple occasions to review and
7 understand the settlement agreement before signing.

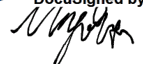
8 8. I also understand that in the event this matter proceeds to trial, I must come to court
9 to participate in the trial. I will come to court if I am needed and have been ready to perform any
10 responsibility that is necessary for this lawsuit. I know that I took a risk by filing this lawsuit
11 because if I lost, I would have to pay for all the costs incurred by the Defendant in the lawsuit. I
12 also have the risk of losing income for any time that I would have to spend fulfilling my
13 responsibilities including having to attend the trial. I also believe I have taken a risk by filing this
14 lawsuit because my employers in the future may find out that I sued my employer, and they may
15 not like it. The other employees who will be receiving money from this lawsuit have not had to file
16 a lawsuit, look for an attorney, or take the risks that I have had to take.

17 9. I understand that the settlement we have reached in this case must be approved by
18 the Court and I must protect the interests of all current and former hourly non-exempt employees
19 of Defendant in California at any time during the period from February 15, 2017, through and
20 including February 27, 2024

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

23 Executed this 16th day of May 2024, at 2255, California.

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28

DocuSigned by:

DEC45D36F5F64BF...
Winifred Allison