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Attorneys for Plaintiff DAMON COFFEY, individually, and on behalf of other members of the public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

DAMON COFFEY, individually, and on
behalf of other members of the public
similarly situated,

Plaintiff

v.

S O U T H E R N C A L I F O R N I A
P E R M A N E N T E M E D I C A L G R O U P, I N C.,
a California Corporation and DOES 1-10,
inclusive

Defendants

CASE NO. 37-2020-00029409-CU-OE-CTL

CLASS ACTION

**DECLARATION OF DAMON COFFEY IN
SUPPORT OF PLAINTIFF'S UNOPPOSED
MOTION FOR FINAL APPROVAL OF (1)
CLASS ACTION SETTLEMENT; (2)
ATTORNEYS' FEES AND COSTS; and (3)
CLASS REPRESENTATIVE AWARD**

Date: May 24, 2024

Time: 9:00 a.m.

Dept.: C-74

Judge: Hon. Blaine Bowman

1 I, Damon Coffey, hereby declare as follows:

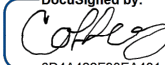
- 2 1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of
3 Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement, Attorneys Fees
4 and Costs, and Class Representative Award.
- 5 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a
6 witness I could and would do so.
- 7 3. To my recollection, I personally met with my Attorneys on at least 11 occasions. Several of
8 those meetings lasted in excess of 2 hours.
- 9 4. During these meetings, I would review and explain numerous documents turned over by
10 Defendants from my employment. I would also explain my (as well as others') role during
11 work. I also helped identify numerous other employees who could support the claims I was
12 making in this lawsuit. I contacted many of these individuals myself to verify their willingness
13 to participate.
- 14 5. I also spoke with my attorneys on the phone on at least 27 other occasions.
- 15 6. I sat for a two full days of deposition in this case. In preparation for these depositions, I spent
16 several hours preparing with my attorneys. I also spent significant time reviewing the
17 settlement documentation and discussing the settlement with my attorneys.
- 18 7. In total, I estimate that I spent at least 50 hours related to the above mentioned tasks directly
19 working with my attorneys. I also spent at least another 8-10 hours of my own time gathering
20 evidence and outlining issues that I later shared with my attorneys.
- 21 8. When I decided to move forward with this case, I was counseled by my attorneys of the
22 potential stigma of being a Class Representative in a class action dispute, as this is a publicly
23 filed lawsuit.
- 24 9. I was also advised when I brought this case that had we lost, I could have been personally
25 liable for paying all of Defendants' costs. I was further advised this could be well into the tens
26 of thousands of dollars on this type of case.

27 ///

28 ///

10. Despite these risks I was committed to achieving a settlement that would benefit all employees working for Southern California Permanente Medical Group.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 2nd day of May, 2024 at San Diego, California.

DocuSigned by:

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DAMON COFFEY