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Attorneys for Plaintiffs BLANCA
VILLAGOMEZ,

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

BLANCA VILLAGOMEZ, as an individual
and on behalf of all others similarly situated,

Plaintiff,

v.

SIMI VALLEY HOSPITAL AND
HEALTHCARE SERVICES, d.b.a.
ADVENTIST HEALTH SIMI VALLEY, a
California corporation; ADVENTIST
HEALTH SYSTEM/WEST, a California
corporation; and DOES 1-100, inclusive,

Defendants.

Case No.: 21STCV38017 (Lead Case)
21STCV43678 (Related Case)

Assigned for All Purposes to:
Hon. Elihu M. Berle
Dept.: 6

**DECLARATION OF BLANCA
VILLAGOMEZ**

Date: March 14, 2025
Time: 10:00 am
Dept.: SSC-6

1
2 I, BLANCA VILLAGOMEZ, declare as follows:

3 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
4 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
5 declaration in support of Plaintiffs' Motion for Approval of PAGA Settlement.

6 2. I worked for Simi Valley Hospital as a non-exempt, Certified Nursing Assistant
7 ("CNA") beginning in or around 2005. While I worked their I don't think I was paid for all of the
8 hours that I worked – for example, I would lose a few minutes of time each day walking through
9 the facility to get to/from the time clocks, and many times I had to clock out at the scheduled end
10 of a shift but keep working because I was in the middle of assisting a patient. I also don't think I
11 received all of my lunches and breaks correctly, as many times breaks would be missed, late, for
12 cut short/interrupted by work. I also had to pay to launder my work clothes and also had to
13 download an app on my phone for work, but never received any reimbursement.

14 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
15 employee of Defendant, especially with regard to me not receiving all of the pay I believe I
16 earned, not getting proper breaks, and having to pay for my own laundry and phone.

17 4. It is my understanding this lawsuit could not have been prosecuted or settled on
18 behalf of the other employees unless some current or former employee decided to serve as a
19 named plaintiff. In deciding to serve as a named plaintiff in this case, I understood that my name
20 could be publicly attached to this lawsuit and that my work experiences to some extent would be
21 set forth in a public court file. I recognized I would need to devote a certain amount of time that I
22 could have spent otherwise. I also recognized my bringing the lawsuit carried some degree of risk
23 for defendants' legal costs among other things. Despite this, I decided to serve as the named
24 plaintiff and proposed PAGA representative, without any promise of recovery or compensation.

25 5. I am familiar with the work involved in prosecuting this case. I have participated
26 in meetings, phone calls, and other communications with my lawyers regarding this case. I am
27 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
28

1 events in this case, including the investigation performed by my lawyers, the mediation with
2 Defendant that resulted in this settlement, and the preparation of settlement papers and the need to
3 obtain court approval of the proposed settlement. I participated in the litigation and provided my
4 lawyers with information and documents regarding my employment with Defendant.

5 6. I believe that the proposed settlement obtained on behalf of the State and other
6 aggrieved employees is excellent in view of the issues and risks involved with the case.

7 7. I believe I have fulfilled my duties as a named plaintiff and representative, which
8 required a significant amount of time and effort during the course of this case. These efforts
9 required dedicating numerous hours to lawsuit activities including, but not limited to:
10 (a) communicating with my attorneys to stay informed of ongoing developments in the case and
11 to discuss the proposed settlement ultimately negotiated; (b) searching for and providing
12 documents and other materials relating to my work experience; (c) responding to requests for
13 information relating to my work experience; and (d) reviewing filings and key documents
14 including drafts of the complaint and the settlement agreement. These tasks required my
15 dedication of at least 15-20 hours of my time, which time I honestly could have spent on family,
16 personal time, or work. My understanding is that future tasks may require several more hours of
17 my time. Further, at all times I was ready, willing and able to testify at deposition and/or trial. I
18 believe I have been diligent and that I have acted above and beyond that of which is expected of a
19 named plaintiff and proposed PAGA representative to date and will continue to do so.

20 8. It is my opinion that \$5,000.00 is a fair and adequate award for my service as the
21 named plaintiff and PAGA Representative. I believe that amount is fair and reasonable in view of
22 the work I have and will continue to perform on behalf of the other employees. I believe that my
23 role as the named plaintiff in this lawsuit has resulted in a valuable benefit to the other
24 employees, and I accepted the potential risk of being liable for the opposing parties' costs if we
25 were unsuccessful in this lawsuit. I believed in this case, so I was willing to be the named plaintiff
26 and to risk this and pursue this litigation. I also accepted the risk that news of this lawsuit could
27 also potentially impact my ability to secure other work.

28 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and

1 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

2 I declare under penalty of perjury under the laws of California that the foregoing is true
3 and correct. Executed on 02 / 07 / 2025, at Simi valley, California.
4

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6 _____
Blanca Villagomez