

1 ZACHARY CROSNER (SBN 272295)
2 zach@crosnerlegal.com
3 CHAD SAUNDERS (SBN 257810)
4 chad@crosnerlegal.com
5 **CROSNER LEGAL, P.C.**
6 9440 Santa Monica Blvd. Suite 301
7 Beverly Hills, CA 90210
8 Tel: (866) 276-7637
9 Fax: (310) 510-6429
10 *Attorneys for Plaintiff Ruthie Braswell*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

RUTHIE BRASWELL, on behalf of
herself, the State of California, and others
similarly situated and aggrieved,

Plaintiff,

v.

AHMC SAN GABRIEL VALLEY
MEDICAL CENTER, LP., a California
limited partnership; AHMC
HEALTHCARE, INC., a California
corporation, AHMC ANAHEIM
REGIONAL MEDICAL CENTER LP, a
California limited partnership; AHMC
SETON MEDICAL CENTER LLC, a
California limited partnership; AHMC
MONTEREY PARK HOSPITAL LP, a
California limited partnership; AHMC
GREATER EL MONTE COMMUNITY
HOSPITAL LP, a California limited
partnership; AHMC GARFIELD
MEDICAL CENTER LP, a California

Case No. 2:21-cv-09959-MWF-AGR

**DECLARATION OF RUTHIE
BRASWELL**

Date: November 18, 2024

Time: 10:00 a.m.

Place: Courtroom 5A

1 limited partnership; and AHMC
2 WHITTIER HOSPITAL MEDICAL
3 CENTER LP, a California limited
4 partnership,

5 Defendants.

1 I, RUTHIE BRASWELL, declare as follows:

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

6 2. I worked for Defendants for over 17 years, including working at the San
7 Gabriel Medical Center hospital, as a Licensed Vocational Nurse. While I worked for
8 Defendants I don't think I was paid for all hours that I worked because my time punches
9 were rounded off, both at the start/end of a shift and when I clocked out for lunch, and
10 as a result I don't I was paid for all of my time when, for example, my lunch lasted a
11 little less than 30 minutes. If that happened it would show my lunch lasted 30 minutes
12 even though it was shorter than that, and I didn't get paid for those extra minutes. I also
13 don't think all of my lunch breaks and rest breaks were correct for the same reasons, ie
14 my lunches didn't always last for 30 minutes, and many shifts I only got one 15 minute
15 rest break.

16 3. I decided to file this lawsuit because I did not feel that I was treated fairly
17 as an employee of Defendants, especially with regard to me not receiving all of the pay
18 I believe I earned, and for not getting all of my lunches and other breaks like I was
19 supposed to.

20 4. It is my understanding this lawsuit could not have been prosecuted or
21 settled on behalf of the other employees unless I or some other current or former
22 employee decided to serve as a named plaintiff and file this case. In deciding to serve
23 as a named plaintiff in this case, I understood that my name could be publicly attached
24 to this lawsuit and that my work experiences to some extent would be set forth in a
25 public court file. I recognized I would need to devote a certain amount of time that I
26 could have spent otherwise. I also recognized my bringing the lawsuit carried some
27
28

1 degree of risk for defendants' legal costs among other things. Despite this, I decided to
2 serve as the named plaintiff without any promise of recovery or compensation.

3 5. I am familiar with the work involved in prosecuting this case. I have
4 participated in meetings, phone calls, and other communications with my lawyers
5 regarding this case. I am familiar with the allegations and defenses of the claims in this
6 case. I am familiar with the major events in this case, including the investigation
7 performed by my lawyers, the arbitration that is pending regarding my personal claims
8 against Defendants, the mediations with Defendants that resulted in this settlement, and
9 the preparation of settlement papers and the need to obtain court approval of the
10 proposed settlement. I participated in the litigation and provided my lawyers with
11 information and documents regarding my employment with Defendants.

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

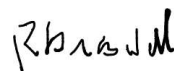
14 7. I believe I have fulfilled my duties as named plaintiff and PAGA
15 representative, which required a significant amount of time and effort during the
16 course of this case. These efforts required dedicating numerous hours to lawsuit
17 activities including, but not limited to: (a) communicating with my attorneys to stay
18 informed of ongoing developments in the case and to discuss the proposed settlement
19 ultimately negotiated; (b) searching for and providing documents and other materials
20 relating to my work experience; (c) responding to requests for information relating to
21 my work experience; and (d) reviewing filings and key documents including drafts of
22 the complaint and the settlement agreement. These tasks required my dedication of at
23 least 20 hours of my time, which time I honestly could have spent on family, personal
24 time, or work, all in addition to time devoted to my arbitration. My understanding is
25 that future tasks may require several more hours of my time. Further, at all times I was
26 ready, willing and able to testify at deposition and/or trial. I believe I have been
27 diligent and that I have acted above and beyond that of which is expected of a named
28

1 plaintiff to date and will continue to do so. To the best of my knowledge I have not
2 conflicts of interest of any kind with any other class member.

3 8. It is my opinion that \$5,000.00 is a fair and adequate award for my
4 service as the named plaintiff and light of the fact that I have separately resolved my
5 individual claims and the ongoing arbitration with Defendants. I believe that amount
6 is fair and reasonable in view of the work I have and will continue to perform on
7 behalf of the other employees. I believe that my role as named plaintiff in this lawsuit
8 has resulted in a valuable benefit to the other aggrieved employees, and I accepted the
9 potential risk of being liable for the opposing parties' costs if we were unsuccessful in
10 this lawsuit. I believed in this case, so I was willing to be the named plaintiff and to
11 risk this and pursue this litigation. I also accepted the risk that news of this lawsuit
12 could also potentially impact my ability to secure other work.

13 9. Based on the time, service, risk, stress, potential stigma, loss of benefits
14 and excellent outcome of this case, I believe the enhancement for me is fair and
15 reasonable.

16 I declare under penalty of perjury under the laws of California that the
17 foregoing is true and correct. Executed on 10 / 17 / 2024, at Azusa, CA,
18 California.
19

20
21 

22 Ruthie Braswell
23
24
25
26
27
28