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Attorneys for Plaintiff Terina Renee Locke,
and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

TERINA RENEE LOCKE, individually
and on behalf of all others similarly
situated,

Plaintiff,

vs.

RIVERSIDE SANITARIUM, LLC; and
DOES 1 through 20, inclusive,

Defendants.

Case No. CIVSB2129216

*Assigned for all purposes to:
Hon. Jessica Morgan
Dept. S26*

**DECLARATION OF TERINA RENEE
LOCKE IN SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

1 I, Terina Renee Locke, declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify, I
3 could and would do so competently under oath.

4 2. I make this declaration in support of my Motion for Approval of Private Attorneys
5 General Act Representative Action Settlement.

6 3. I worked for Riverside Sanitarium, LLC ("Defendant") as a non-exempt employee
7 from June 2020 to October 2020 in the position of Certified Nurse Assistant.

8 4. Through my attorneys, I filed this action in October 2021, on behalf of myself and all
9 other non-exempt employees of Defendants.

10 5. With respect to the work I performed on the case, I participated in many conversations
11 with my attorneys, gathered and reviewed documents, and provided information related to my
12 working conditions and Defendant's company structure and operations. Throughout the course of this
13 case, I contacted my attorneys regularly for updates on the status of the case.

14 6. For mediation, I assisted my attorneys in preparation and strategy. I spoke with my
15 attorneys about the status of the case, its strengths and weaknesses and believed that I assisted them
16 in evaluating the claims and the potential damages for use at that mediation.

17 7. After mediation, I reviewed the settlement agreement and discussed the terms with my
18 attorneys. Based on my review of the settlement terms, conversations with my attorneys, and my
19 understanding of Defendant's operations, I believe the settlement in the case is fair and adequate and
20 in the best interest of the employees covered by the settlement.

21 8. Overall, I dedicated approximately 60 hours to pursue the PAGA representative claims
22 in this lawsuit.

23 9. When I decided to become involved in this lawsuit as a PAGA representative, I chose
24 to do so instead of pursuing my own claims in arbitration. I also understood that I might be responsible
25 for some or all of Defendant's legal costs if the case was not successfully concluded. Even with
26 knowledge of these risks, I was willing to go forward and to act on behalf of the State and aggrieved
27 employees, but I was nervous about losing and having a judgment filed against me for costs, or losing
28 job opportunities in the future.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct and that this declaration was executed on _____ in California.
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5 _____
6 Terina Renee Locke
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