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Attorneys for Plaintiff and the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA**FOR THE COUNTY OF MONTEREY**INGRID HANSEN-SCHOOLDERMAN, an
individual, on behalf of herself and others
similarly situated.

PLAINTIFF,

v.

SOUTHERN MONTEREY COUNTY
MEMORIAL HOSPITAL; and DOES 1 thru
50, inclusive,

DEFENDANTS.

CASE NO. 21CV003609

[Case Assigned for All Purposes to Hon.
Thomas W. Wills in Dept. 15]**DECLARATION OF INGRID HANSEN-
SCHOOLDERMAN IN SUPPORT OF
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

Date: November 17, 2023

Time: 8:30 A.M

Dept.: 15

Complaint Filed: November 12, 2021

FAC Filed: March 16, 2022

Trial Date: None

DECLARATION OF INGRID HANSEN-SCHOOLDERMAN

I, INGRID HANSEN-SCHOOLDERMAN, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant SOUTHERN MONTEREY COUNTY MEMORIAL HOSPITAL ("Southern Monterey" or "Defendant"). I worked as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that Southern Monterey failed to pay wages and/or overtime, provide meal breaks, provide rest breaks, provide accurate itemized wage statements, and pay wages at the time of termination to me and other employees.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched attorneys to help me pursue this matter. I wanted to find counsel who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed on November 21, 2021.

6. Throughout the litigation, I have been in regular contact with my attorneys and provided them with helpful information for this lawsuit and for the proposed settlement as needed. Specific work includes providing information to my attorneys regarding my employment with Defendant, compiling and providing relevant employment documents to my attorneys. staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys' various communications regarding this matter, making myself available for the full-day mediation on March 7, 2023; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class

1 Members.

2 7. I believe that the class action settlement obtained on behalf of the Class is fair and
3 reasonable in light of the issues involved in this case. As mentioned above, I reviewed and
4 discussed the Agreement with my attorneys and asked them questions about it to ensure that I
5 understood its terms and what it would mean for all of the class members.

6 8. I believe that I have fairly represented the absent Class and request that the Court
7 finally approve this settlement and confirm me as Class Representative. I have worked to actively
8 represent the other Class Members and their interests and I believe that I have always kept the
9 Class Members interests at heart in this litigation.

10 9. I am prepared to continue assisting with this litigation and am committed to
11 achieving the best possible results for the Class.

12 10. I am not aware of any conflicts of interest that prevent me from being confirmed as
13 Class Representative in this Action. I am not related in any way to my attorneys or to any other
14 member of the firm that is representing me. I have no business dealings or other involvement
15 beyond this lawsuit and this representation. I have not been promised any money or inducement
16 to serve as Class Representative in this Action.

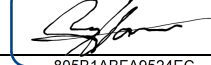
17 11. It is my opinion that the settlement agreement provides for a fair and adequate
18 enhancement for me as a Class Representative, in the amount of \$5,000. I believe that this is fair
19 and reasonable in light of all of the work that I have performed in my role as Class Representative.
20 As Class Representative, I have actively participated in all stages of the litigation, as detailed
21 above, and have always maintained the best interests of the Class while performing my Class
22 Representative duties.

23 12. It is also my opinion that the Class Representative enhancement is fair, reasonable,
24 and adequate because, in addition to the many hours spent participating in the prosecution of this
25 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
26 were unsuccessful in this Action. Likewise, I risked the potential stigma of being a Class
27 Representative in a class action labor dispute, which may affect my future employability.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct.

3 Executed this 23 day of October, 2023 at El Dorado
4 Arkansas.

DocuSigned by:



805B1ABF495245C
INGRID HANSEN-
SCHOOLDERMAN

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On October 25, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF INGRID HANSEN-SCHOOLDERMAN IN SUPPORT OF FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

FENTON & KELLER, APC	ABRAMSON LABOR GROUP
Elizabeth R. Leitzinger Eleitzinger@fentonkeller.com Gladys Rodriguez-Morales gmorales@fentonkeller.com 2801 Monterey-Salinas Highway Post Office Box 791 Monterey, CA 93942	William Zev Abramson Wza@abramsonlabor.com 11846 Ventura Blvd, Suite 100 Studio City, CA 91604

☐ **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

☒ **BY ELECTRONIC MAIL TRANSMISSION:** I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 25, 2023, at Woodland Hills, California.



Michelle Tanzer