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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF VENTURA

PAOLA URIBE, MARIA SOTO, KAREN
HART, WILSON CHUNG, and LISA
BURTON, individuals, on behalf of
themselves, all persons similarly situated,
aggrieved employees, and the State of
California,

Plaintiffs,

v.

MONROE OPERATIONS, LLC, dba
NEWPORT HEALTHCARE and
NEWPORT ACADEMY and NEWPORT
INSTITUTE and CENTER FOR
FAMILIES, and DOES ONE through
TWENTY inclusive,

Defendants.

CASE NO: 56-2021-00561341-CU-OE-VTA

Assigned to the Hon. Mark S. Borrell, Dept. 40

CLASS ACTION

**DECLARATION OF KAREN HART IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: May 31, 2024

Time: 8:30 a.m.

Dept.: 40

Complaint Filed: March 18, 2021

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2 I, KAREN HART, hereby declare and state as follows:

3 1. I am a named Plaintiff in a pending lawsuit and arbitrations against Defendants
4 MONROE OPERATIONS, LLC, dba NEWPORT HEALTHCARE and NEWPORT ACADEMY
5 and NEWPORT INSTITUTE and CENTER FOR FAMILIES (“Defendants”) and I submit this
6 declaration in support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class and
7 Representative Action Settlement. I am a competent adult and worked for one or more of the
8 Defendants as a non-exempt employee during the relevant time period. I have personal knowledge
9 of the facts set forth herein, and if called as a witness to testify to them, I could and would do so
10 competently.

11 2. I contacted my current attorneys when I questioned the employment practices of
12 Defendants prior to commencing my lawsuit. I accepted the opportunity to act as a Class
13 Representative in a class action on behalf of other employees of Defendants whom I believed were
14 being subjected to labor law violations. Although presented with the opportunity, I did not pursue
15 this case on an individual basis and instead did so as a representative action so that I could help
16 other employees recover for what I believed were Defendants’ illegal practices.

17 3. Specifically, I questioned Defendants’ practices of failing to pay all wages; failing
18 to provide all meal and rest periods; failing to timely compensate employees upon separation; and
19 issuing their employees deficient wage statements. Through many discussions with my lawyers,
20 I learned these may be illegal practices and Defendants’ employees might have recourse for them.

21 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
22 employees ahead of my own. I understood that I could possibly earn a small enhancement payment
23 if this case resolved itself favorably, but always knew that I could also be responsible for paying
24 Defendants’ attorneys’ fees and costs if it did not. My goal in bringing this lawsuit was to obtain
25 a recovery on behalf of all employees, and even more importantly, to put an end to what I believed
26 were illegal practices on the part of Defendants. I believe I have achieved both through this lawsuit
27 and settlement.
28

1 5. I am very happy about the results of this litigation. I am satisfied that Defendants
2 are compensating class members for unpaid wages, premium wages for missed meal and rest
3 periods, penalties, and interest that I believe we are due.

4 6. At the onset of this case, I spent time through numerous phone calls with several of
5 my attorneys explaining what I understood to be the policies and procedures of Defendants and
6 how they were applied to me and others I worked with. During the course of this litigation, up
7 through and following the settlement process, I kept actively involved with its status, tracking the
8 status of the case and participating as much as possible.

9 7. While I have not maintained detailed time records of my activities in connection
10 with this litigation, I believe that have spent and will spend a total of approximately 25 hours
11 assisting my attorneys with the preparation of this case, and doing work and analysis independent
12 from my attorneys both before and during this case, including conducting an independent
13 investigation of the facts.

14 8. Before this litigation commenced, and throughout its course, I have spent
15 approximately 12.5 or more hours gathering, organizing, and reviewing documents and
16 information for this lawsuit. I sifted through many of my own documents and reviewed
17 information produced by Defendants as part of this case.

18 9. I have communicated with my attorneys several times per month to track my case's
19 status. I have taken an active involvement in this matter throughout its course.

20 10. This lawsuit will almost certainly result in reputational harm to me. There is a
21 stigma associated with suing anyone, let alone your former employer. I will probably be adversely
22 affected when it comes to obtaining future employment – employers who learn that I sued
23 Defendants in a class action will likely avoid hiring me.

24 11. I do not believe that I have any conflicts with other members of the class. My
25 interests in bringing this lawsuit – for Defendants to change their labor practices going forward
26 and to compensate current and former employees – are the same as those of all other class
27 members.

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

3 Executed on April 22, 2024 at Vacaville, California.

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7 KAREN HART
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