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11 Attorneys for Plaintiff

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF SAN JOAQUIN

14 ROLLETA MANGARON, on behalf of the
15 State of California, as a private attorney
16 general,

17 Plaintiff,

18 v.

19 DOCTORS HOSPITAL OF MANTECA, INC.,
20 a California Corporation; and DOES 1 through
21 50, inclusive,

22 Defendants.

CASE NO.: STK-CV-UOE-2022-2437

**DECLARATION OF ROLLETA
MANGARON IN SUPPORT OF MOTION
TO APPROVE PAGA SETTLEMENT**

Hearing Date:

Hearing Time:

Judge: Hon. John Soldati

Dept.: 10D

Action Filed: April 5, 2022

Trial Date: Not Set

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28 DECLARATION OF ROLLETA MANGARON IN SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT

1 I, Rolleta Mangaron, declare as follows:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration, and I am
3 making this declaration on behalf of myself, as a named plaintiff, and in support of the Motion to
4 Approve Private Attorneys General Act Settlement.

5 2. I worked in California as a non-exempt employee of Defendant Doctors Hospital of
6 Manteca, Inc. ("Defendant") from March of 2019 to February of 2021.

7 3. I retained my attorneys who are experienced in PAGA representative action litigation and
8 claims against employers for violations of the California Labor Code. I have no personal
9 relationship or family ties to my attorneys or any officer of the Court. I am not aware of having
10 any actual or potential conflicts of interest with another class member in this case nor am I aware
11 of having any actual or potential conflicts of interest with ILYM Group, Inc., the settlement
12 administrator.

13 4. I was subject to Defendant's policies and practices that have been alleged as unlawful in
14 the Complaint and the PAGA notice sent to the Labor and Workforce Development Agency. For
15 example, I was not compensated for all my time worked, I often did not receive compliant meal
16 and rest breaks which were late, interrupted or missed entirely. In addition, I had to use my
17 personal cell phone for work related purposes without reimbursement.

18 5. In bringing this case for myself, the State of California, and the other employees, I
19 understood a lot of work would be required and I was willing to, and did, do the work to keep the
20 case moving forward. For instance, before the complaint was filed I spoke to my attorneys several
21 times and discussed how Defendant implemented its company policies and procedures. I also
22 assisted my attorneys in their investigation into my claims by providing them documents and
23 answering their questions. I reviewed the complaint before it was filed and after it was filed I was
24 given access to an electronic file sharing program that alerted me via email when important
25 documents were filed so that I could review them and keep up with the developments in the case. I
26 was informed that the Defendant had the right to take my deposition, and that the preparation and
27 deposition itself could take multiple days. Although my deposition was not taken, I feel I would

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DECLARATION OF ROLLETA MANGARON IN SUPPORT OF MOTION TO APPROVE
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1 have been adequately prepared and comfortable to give testimony on my experiences.

2 6. My attorneys explained to me the risks and benefits of bringing a representative action. I
3 understood that I took on the risk, both professionally and financially, in pursuing the case as a
4 representative PAGA action.

5 7. A mediation took place on November 3, 2025, with Lisa Klerman, a well-respected and
6 experienced mediator. The mediation resulted in an agreement to settle the action. I communicated
7 with my attorneys regarding the terms of the settlement which was reached between the parties
8 and understood that the recovery in this case was for the benefit of my fellow coworkers, not just
9 for me, and therefore wanted the best possible result to be obtained for the aggrieved employees. I
10 reviewed and signed the Memorandum of Understanding on January 8, 2026.

11 8. I have been actively involved with this lawsuit. Although I did not keep time records, I was
12 in regular contact with my attorneys, reviewed court filings, and spent a significant amount of time
13 on the issues presented during the lawsuit and in the settlement process. I estimate that I spent
14 approximately 30-40 hours working on this case up until this point.

15 9. I reviewed the final PAGA Settlement Agreement and I believe it is fair and reasonable
16 given the facts of the case.

17 10. I believe the \$10,000 Service Award I have requested is fair compensation for my efforts
18 in support of this action and the risks I undertook.

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DECLARATION OF ROLLETA MANGARON IN SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT

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

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4 Executed on 09/02/2026, at Manteca, CA.
(city, state)

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ROLLETA MANGARON (Sep 2, 2026 08:56:36 PDT)
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DECLARATION OF ROLLETA MANGARON IN SUPPORT OF MOTION TO APPROVE
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I, Yesenia Silva, am a citizen of the United States and a resident of the State of California. I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 2255 Calle Clara, La Jolla, California 92037. On September 2, 2026, I served the document(s) described as:

1. DECLARATION OF ROLLETA MANGARON IN SUPPORT OF MOTION TO APPROVE PAGA SETTLEMENT

X **(ONLINE TO THE LWDA):** I caused the above-described document(s) to be delivered to the Labor Workforce Development Agency via online process at the PAGA Filing website in accordance with the procedure imposed by the LWDA.

X **(BY ELECTRONIC SERVICE):** I provided the documents referenced above electronically via electronic mail (e-mail) to counsel for Defendant at the following e-mail address(es):

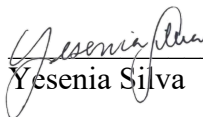
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Cc: Nora Palencia npalencia@littler.com

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

Executed on September 2, 2026, at San Diego, California.



Yesenia Silva