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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO

JAMIE JOHNSON, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

SAN FRANCISCO HEALTH CARE AND
REHAB INC, a California Corporation;
and DOES 1 through 20, inclusive;

Defendants.

Case No.: CGC-22-597785
*[Assigned to Hon. Andrew Y.S. Cheng, Dept.
613, for all purposes]*

**DECLARATION OF PLAINTIFF JAMIE
JOHNSON**

I, Jamie Johnson, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. When I first retained my attorneys (Lauby, Mankin & Lauby) and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my own personal interests, (3) participating

1 actively in the lawsuit, including potential testimony at deposition and trial, and keeping
2 generally aware of the status and progress of the lawsuit. Moreover, I understood that any
3 resolution of the lawsuit is subject to court approval and must be designed in the best interests of
4 the class as a whole.

5 3. Since first initiating this action on behalf of the proposed class, I believe that I
6 have more than adequately performed my duties as a class representative. I have been an active
7 participant in this litigation, including assisting my attorneys in various ways and making myself
8 available when needed. For example, I have assisted my attorneys by compiling and analyzing
9 substantial documentation regarding the claims in this case and have also responded to formal
10 discovery. I have also helped to explain and discuss the company's practices and their general
11 practices and procedures, locating and analyzing company documents, among others. I have also
12 reviewed all settlement documents and believe that this settlement is fair for the class. Finally, I
13 will continue to take all steps necessary to finalize this settlement and obtain court approval.

14 4. Additionally, I believe that my claims are typical of the other employees (the class
15 members) because we were all subjected to the same uniform practices of the company in regard
16 to payment of wages, calculation of the regular rate of pay and overtime, meal and rest breaks,
17 wage statements, along with other issues. For example, I (like all other class members) was
18 subjected to Defendant's policy which paid shift differentials and bonuses, yet those amounts
19 were not factored into overtime pay. Similarly, I was subjected to the same issues with meal
20 periods as other class members, including being denied meal periods and then having 30 minutes
21 taken out of our work shift anyway (resulting in unpaid wages).

22 5. I have no conflicts with the proposed class members and will continue to assist
23 with the litigation and prosecute the case on behalf of the other employees.

24 6. I respectfully request that the court preliminarily approve the service award. As
25 outlined above, I have performed substantial services for the Class, including providing
26 discovery responses and assisting at various stages of the litigation. I also undertook significant
27 risks and stresses at a high emotional cost without any guarantee of success. For example, filing
28 this lawsuit and being a whistle blower was stressful on a day-to-day basis as I have constantly

1 worried about the risk that this case could impact my ability to find future jobs. And this
2 stress/risk lasted for the entire case, and I'm still worried it may make it hard to find a job in the
3 future. Additionally, via my decision to bring this as a class action, and my active participation
4 in the same, I helped obtain a highly beneficial settlement for my fellow employees. At the final
5 approval stage, I will submit an additional declaration setting forth all the work I did for this
6 case, including an estimated number of hours spent assisting the Class and my attorneys.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct. Executed on May 6, 2025, at San Francisco, California.

9
10 By:


Jamie Johnson (May 6, 2025 13:07 PDT)

Jamie Johnson