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**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

PAULA GONZALEZ, on behalf of the State
of California, as a private attorney general,

Plaintiff,

vs.

LANCASTER HOSPITAL CORPORATION,
a California Corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No. 22AVCV00254

**DECLARATION OF PAULA
GONZALEZ IN SUPPORT OF MOTION
TO APPROVE PAGA SETTLEMENT**

Judge: Hon. Michael C. Kelley
Dept.: A15

Hearing Date: May 28, 2024

Hearing Time: 8:30 a.m.

Action Filed: April 15, 2022

Trial Date: Not Set

1 I, Paula Gonzalez, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration, and I
3 am 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 Lancaster Hospital
6 Corporation ("Defendant") from March of 2021 to December of 2021.

7 3. I retained my attorneys who are experienced in PAGA representative action litigation
8 and 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 any
10 actual or potential conflicts of interest with another PAGA Employee in this case nor am I aware of
11 having any actual or potential conflicts of interest with ILYM Group, the settlement administrator.

12 4. I was subject to all of Defendant's policies and practices that have been alleged as
13 unlawful in the Complaint and the PAGA notice sent to the Labor and Workforce Development
14 Agency. For example, I was not paid for all compensable time, such as pre-shift off the clock work.
15 Specifically, I began my workday with an off the clock temperature check. The off-the-clock work
16 continued with walking time, obtaining and donning personal protective equipment (eg. mask), and the
17 requirement to stow my personal belongings in a locker before clocking in. I also had to respond to
18 supervisors while off the clock on my personal cell phone regarding work-related issues but was not
19 paid for this time nor was I reimbursed for the expenses I incurred. I also did not always receive
20 compliant meal and rest breaks and when these violations occurred I did not receive all the meal or rest
21 break premium payments I should have received.

22
23 5. In bringing this case for myself, the State of California, and the other employees, I
24 understood a lot of work would be required and I was willing to, and did, do the work to keep the case
25 moving forward. For instance, before the complaint was filed I spoke to my attorneys several times and
26 discussed how Defendant implemented its company policies and procedures. I also assisted my attorneys
27 in their investigation into my claims by providing them documents and answering their questions. I
28

1 reviewed the complaint before it was filed and after it was filed I was given access to an electronic file
2 sharing program that alerted me via email when important documents were filed so that I could review
3 them and keep up with the developments in the case. I was informed that Lancaster Hospital had the right
4 to take my deposition, and that the preparation and deposition itself could take multiple days. Although
5 my deposition was not taken, I feel I would have been adequately prepared and comfortable to give
6 testimony on my experiences.

7
8 6. My attorneys explained to me the risks and benefits of bringing a representative action.
9 I understood that I took on the risk, both professionally and financially, in pursuing the case as a
10 representative PAGA action.

11
12 7. A mediation took place on October 10, 2023 with Tripper Ortman, a well-respected and
13 experienced mediator. The mediation resulted in an agreement to settle the action. I communicated with
14 my attorneys regarding the terms of the settlement which was reached between the parties and understood
15 that the recovery in this case was for the benefit of my fellow coworkers, not just for me, and therefore
16 wanted the best possible result to be obtained for the PAGA Employees.

17
18 8. I have been actively involved with this lawsuit. Although I did not keep time records, I
19 was in regular contact with my attorneys, reviewed court filings, and spent a significant amount of time
20 on the issues presented during the lawsuit and in the settlement process. I estimate that I spent
21 approximately 30-40 hours working on this case up until this point.

22
23 9. I reviewed the final PAGA Settlement Agreement and I believe it is fair and reasonable
24 given the facts of the case.

25 10. As part of the settlement it was necessary for me to sign a general release of claims I
26 may have against the Defendant. I believe the Enhancement Award I have requested provides me with
27 some compensation for this agreed release and is also fair compensation for the service I performed and

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1 the risks I undertook.

2
3 Executed on Mar 25, 2024, at Victorville, California
4 (city, state)

5 *Paula Gonzalez*

6 Paula Gonzalez