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10 CARRIE LAMBERT, individually, and
11 on behalf of all others similarly situated

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES — SPRING STREET COURTHOUSE

11 CARRIE LAMBERT, an individual, on behalf of
12 herself and all others similarly situated,

13 Plaintiff,

14 vs.

15 DUAL DIAGNOSIS TREATMENT CENTER,
16 INC., a California corporation; SHREYA
17 HEALTH OF CALIFORNIA, INC., a California
18 corporation; SATYA HEALTH OF
19 CALIFORNIA, INC., a California corporation;
20 SOVEREIGN ASSET MANAGEMENT, INC., a
California corporation; ATHENA
HEALTHCARE, INC., a California corporation;
ADEONA HEALTHCARE, INC., a California
corporation; TONMOY SHARMA, an individual;
and DOES 1 through 50, inclusive,

21 Defendants.

Case No. BC616149

[Assigned for all purposes to the
Honorable Lawrence Riff, Dept. SSC-7]

**DECLARATION OF PLAINTIFF
CARRIE LAMBERT IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Date: May 16, 2024
Time: 10:00 a.m.
Dept: SSC07

Complaint filed: April 6, 2016
Trial Date: None Set

DECLARATION OF CARRIE LAMBERT

I, Carrie Lambert, hereby declare as follows:

1. I am the named plaintiff in the above-entitled action, *Lambert, et al. v. Dual Diagnosis Treatment Center, Inc., et al.*, Los Angeles County Superior Court, Case No. BC616149. I make this declaration on the basis of personal firsthand knowledge, except as to those matters stated on information and belief. If called as a witness, I could and would readily and competently testify to all matters stated within.

2. I make this declaration in support of Plaintiff's Motion for Approval of PAGA Settlement.

3. I was employed by Defendants as a House Manager from on or about November 27, 2014 through on or about June 29, 2015. I first worked at Defendants' house on Short Avenue in Los Angeles, followed by their house on Ogden Avenue in Los Angeles. As a House Manager, my primary job duties included the supervision of patients, the distribution of medication to patients, the preparation of meals for patients, and the transportation of employees to and from Defendants' Culver City treatment facility.

4. I brought this action under the California Labor Code Private Attorneys General Act of 2004 ("PAGA"). I have acted as a representative of the state and on behalf of other non-exempt aggrieved employees of Defendants.

5. I have spent approximately 50 hours on this case, including, but not limited to: in-person and telephonic meetings with my attorneys, responding to discovery, searching for and producing relevant documents, preparing for and attending my deposition, preparing for and responding to questions from my attorneys in preparation for mediation, and reviewing the settlement agreement with my attorneys to ensure that its terms are fair and achieve PAGA's objectives.

6. I fully realized the risks I would be taking by pursuing this action as a PAGA representative. I knew that my future employer might conduct a background check on me or otherwise find out about my participation in the lawsuit against a previous employer and might retaliate against me as a result. I also knew that, as a PAGA representative, I would be bearing

1 risks that other aggrieved employees would not be facing.

2 7. I also knew that I placed myself at a substantial risk because if Defendants were to
3 prevail in this action, I could have been liable for Defendants' litigation costs. Yet I felt so
4 strongly about standing up for the rights of Defendants' employees that I initiated and
5 participated fully in this lawsuit.

6 8. From the time I became a PAGA representative in this litigation, I took an active
7 role in participating in decisions concerning the case, including settlement. I maintained regular
8 contact with my attorneys, via phone and in person, to give them additional information and to
9 keep myself informed of the developments in the case. I made sure that I understood everything
10 that was going on in the case so I could make the best informed decisions on behalf of the state
11 and other aggrieved employees.

12 9. I believe that the requested \$5,000.00 Service Payment for serving as a PAGA
13 representative is reasonable given the substantial time and effort I have expended on behalf of the
14 other aggrieved employees and the risks I faced in serving as a named plaintiff. As part of the
15 Settlement, I am releasing my individual wage and hour claims against Defendants and waiving
16 my rights under Civil Code § 1542 as to any and all claims against Defendants. I believe that I
17 should receive an enhancement award, in part, because this is a more comprehensive release than
18 the release that is applicable to the other aggrieved employees.

19 10. Moreover, based on my information and belief, approximately 1,099 aggrieved
20 employees will be able to recover penalties for the alleged wage and hour violations. Because I
21 put myself on the line, each aggrieved employee did not have to expend his or her own time and
22 resources to pursue legal remedies individually. This action would not have been possible without
23 my active participation and my willingness to place myself at risk for the sake of the other
24 aggrieved employees. In addition, the LWDA will receive approximately \$353,750.00 as 75
25 percent of the PAGA Penalties, which is a substantial amount to punish Defendants for the
26 alleged Labor Code violations, to deter future violations, and to assist the LWDA with the
27 enforcement of labor laws.

28 11. I know that without my efforts, this lawsuit would not have been brought on behalf

1 of the aggrieved employees of Defendants and aggrieved employees would not have received
2 payment for civil penalties. Throughout the entire litigation, I did the best that I could to represent
3 the state and other aggrieved employees and to look out for their interests.

4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct. Executed on 2/22/24, 2024 at Sunnyvale,
6 California.

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Carrie Lambert (Feb 22, 2024 18:57 PST)
9 CARRIE LAMBERT