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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

ERICA MORRIS, YOLANDA ORTEGA-
CALBERT, MARIBEL BLANDINO, and
DORETHA HUGHES, individually, on
behalf of themselves and on behalf of all
persons similarly situated,

Plaintiffs,

vs.

THE PERMANENTE MEDICAL GROUP,
INC., a California Corporation; and DOES
1 through 50, inclusive,

Defendants.

CASE NO.: 34-2022-00332012-CU-OE-GDS

[Consolidated with Case No. 34-2022-
00332023-CU-OE-GDS]

**DECLARATION OF DORETHA HUGHES
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Date: April 18, 2025

Hearing Time: 9:00 a.m.

Judge: Hon. Jill H. Talley

Dept: 23

Date Filed: December 28, 2022

Trial Date: Not set

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1 much as possible, including assistance to my attorneys through discovery and the mediation which
2 included providing documents pertaining to my attorneys and answering questions.

3 9. I have communicated with my attorneys several times per month to track my case's
4 status. I have taken an active involvement in this matter throughout its course, including
5 assistance to my attorneys through discovery and the mediation.
6

7 10. This lawsuit may result in reputational harm to me. There can be stigma associated
8 with suing anyone, let alone your former employer. I may be adversely affected when it comes to
9 obtaining future employment – employers who learn that I sued Defendant in a class action will
10 likely avoid hiring me.

11 11. I have willingly participated in the action as the named plaintiff and I will continue
12 to do so as long as this case is pending. I volunteered to represent the other class members in this
13 case so that they can benefit from my attempt to enforce California law and so that other class
14 members would not have to expend time, effort, and money pursuing individual cases for the same
15 thing.
16

17 I declare under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct.

19 Executed on this 21st day of March, 2025, at Mountain House, California.
20

21 By: Doretha Hughes
Doretha Hughes (Mar 21, 2025 16:07 PDT)
22 Doretha Hughes
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