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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 FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: September 5, 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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2. I am the named Plaintiff in an action against Kaiser entitled *Doretha Hughes v. The Permanente Medical Group, Inc.*, Superior Court of State of California, at the County of Alameda, Case No. 23CV041489. I submit this declaration in support of Motion for Final Approval of Class Action Settlement.

4. I understand that I am one of the named representatives in this action. I understand the claims asserted in this action on behalf of the class is that Defendant failed to properly pay me and other employees.

5. I know of no reason that my interests in this action are inconsistent with the interests of any other class member.

6. I believe that my claims are typical of the claims of other class members and involve the same issues. In filing this lawsuit, I was trying to obtain compensation for myself and for all class members for the actions of Kaiser that I believed to be improper. I am very happy about the results of this litigation. I am satisfied that Defendant is compensating class members that I believe we are due.

7. As one of the named plaintiffs and purported class representatives, I am requesting an incentive payment in the amount of \$20,000.00.

8. During the course of this litigation, up through and following the settlement process, I kept actively involved with its status, tracking the status of the case and participating as

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 8th day of August, 2025, at Mountain House, California.
20

21 By: 
22 Doretha Hughes (Aug 8, 2025 13:08:11 PDT)
23 Doretha Hughes
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