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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

PAMELA RACE, SUSAN MOHAMED, and
JUDITH SMULAND, on behalf of others
similarly situated and the State of California under
the Private Attorneys General Act,

Plaintiffs,

v.

SOUTHWEST HEALTHCARE SYSTEM
AUXILIARY; SOUTHWEST HEALTHCARE
INLAND VALLEY HOSPITAL; SOUTHWEST
HEALTHCARE RANCHO SPRINGS
HOSPITAL; and DOES 1 through 50, inclusive,

Defendants.

Case No. 24CU021889C

Hon. Matthew C. Braner
Dept. 60

**DECLARATION OF PLAINTIFF PAMELA
RACE**

[Filed concurrently with Joint Stipulation
Requesting Approval of Representative PAGA
Settlement; Declarations; and [Proposed] Order]

Action Filed: November 12, 2024

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1 I, Pamela Race, declare as follows:

2 1. I am over 18 years of age and am the named plaintiff in this lawsuit. I am familiar with
3 and have personal knowledge of the facts set forth in this declaration.

4 2. I submit this declaration in support of the Court's approval of the proposed PAGA
5 settlement. If called as a witness, I would competently testify honestly to the below facts based on my
6 personal knowledge.

7 3. I was employed by Defendant Universal Health Services of Rancho Springs, Inc.
8 ("Defendant") as a Nurse Care Manager from March 2024 to May 2024. I was paid as an hourly wage
9 employee.

10 4. During my employment, I became familiar with Defendant's employment practices,
11 which led me to believe me to identify payment issues that I alleged in the complaints filed by my
12 lawyers with the Court.

13 5. As a result, I searched for an employment lawyer to take legal action on behalf of myself
14 and my coworkers.

15 6. My intent was to find a lawyer to correct some of the payment and timekeeping practices
16 occurring.

17 7. I came across Ferraro Vega Employment Lawyers. Mr. Ferraro, Ms. Vega, and their
18 law firm agreed to take my case and move forward on a PAGA action basis. They accepted my case
19 on a contingency fee basis.

20 8. Prior to filing the case, I have spoken at length with my attorneys and their staff,
21 provided documents and records in my possession, signed authorizations so that my attorneys could
22 request additional employment and payroll records, and provided my attorneys with contacts and
23 witnesses to speak to.

24 9. Before we filed the case, my lawyers conducted significant investigation—reviewing
25 my employment and payroll records and going over in detail specific examples of wrongful conduct I
26 alleged in the complaints.

1 10. I filed this lawsuit and have stayed involved since then by reviewing policies and
2 documents, emailing, texting, and calling my lawyers, and responding to their questions as needed.

3 11. I enjoyed working with my legal counsel and am satisfied that we were able to come to
4 a resolution.

5 12. My lawyers advised me when I filed this case that it could take a long time and that I
6 would be better off individually bringing and settling my own individual action, but I elected to go with
7 the PAGA action option because it allowed for relief, recovery, and change to policies and practices in
8 a way that an individual lawsuit alone probably could not have accomplished.

9 13. I think that the total settlement of \$841,579, where individuals are going to passively
10 receive compensation, is significant. It is something I am proud of. I am aware that no other employees
11 have taken action to bring this case and that this case was the catalyst for recovery to aggrieved
12 employees.

13 14. Although I am proud to have my name on this lawsuit for the benefit of my coworkers,
14 this lawsuit has caused difficulty and stress in my personal and professional life. For example, the
15 public nature of this lawsuit—and potential employers’ potential misconception of the lawsuit—caused
16 me concern with how it might affect my employment prospects.

17 15. When I decided to file this lawsuit, I was aware that this action is public record. I
18 understood that the lawsuit could continue for several years and would require my participation,
19 attention, and determination the entire time. I was made aware that I could become responsible for
20 some or all of my former employer’s legal costs if the case did not conclude successfully (though my
21 lawyers advised me this risk was ultimately low because I was bringing the claims based on strong
22 facts and in good faith). Despite these risks, I decided to serve as a proposed representative and the
23 named plaintiff.

24 16. I filed this case to rectify workplace conduct. I feel good about seeing the case through
25 and bringing it to a final close.

26 17. I spent many hours working on this case before and after it was filed. I provided my
27 attorneys with information related to Defendant’s policies and practices. I gathered documents related
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1 to my case and reviewed the documents provided by Defendant in discovery and in advance of
2 mediation. I provided information that would have been used in my discovery responses. I reviewed
3 information and documents produced by Defendant, helped with my declaration in support of this
4 action, and frequently communicated with my attorneys by telephone, text message, and email to
5 provide insight and perspective on this case.

6 18. I spoke with my attorneys and provided questions to be asked of Defendant for
7 documents and information related to this case. I made myself available for mediation, and throughout
8 this lawsuit, and I regularly contacted my lawyers for updates and to answer their questions.

9 19. I understand that I may be entitled to an additional payment for acting as a
10 representative of this PAGA Action, and that this payment is subject to Court approval. Considering
11 the time I devoted to this case, the concerns I address above, the risks, and the results achieved through
12 the settlement, I believe that the requested service payment of \$5,000 is reasonable.

13 20. It is hard to determine exactly how much time I spent on this case. Some weeks required
14 much more time than others, such as during the pre-lawsuit investigation and discovery, and the lead
15 up to the scheduled mediation. I spent a considerable amount of time working on my case, during my
16 personal and family time outside of work hours, and I spent even more time thinking about this case. I
17 am glad it has come to a successful conclusion.

18 I declare under penalty of perjury under the laws of the State of California and the United States
19 of America that the foregoing is true and correct. Executed on 9/10/2026, at
20 Murrieta, CA.

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