

James R. Hawkins, SBN 192925
 Isandra Fernandez, SBN 220482
 isandra@jameshawkinsaplc.com
 Lance Dacre, SBN 190305
 lance@jameshawkinsaplc.com
 JAMES HAWKINS APLC
 9880 Research Drive, Suite 200
 Irvine, CA 92618
 Telephone:(949) 387-7200
 Facsimile: (949) 387-6676

Attorneys for Plaintiff, ALEXANDRIA ILENE KABITZKE,
 on behalf of herself and all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN DIEGO – HALL OF JUSTICE**

ALEXANDRIA ILENE KABITZKE on behalf
 of herself and all others similarly situated,

Plaintiff,

v.

CENTRO DE SALUD DE LA COMUNIDAD
 DE SAN YSIDRO d/b/a SAN YSIDRO
 HEALTH, a California corporation; and DOES
 1 through 50, inclusive,

Defendants.

Case No. 37-2022-00046873-CU-OE-CTL
 ASSIGNED FOR ALL PURPOSES TO:
 JUDGE: Hon. Gregory Pollack
 DEPT: 71

**DECLARATION OF ALEXANDRIA
 ILENE KABITZKE IN SUPPORT OF
 MOTION FOR FINAL APPROVAL OF
 CLASS AND PAGA SETTLEMENT**

DECLARATION OF ALEXANDRIA ILENE KABITZKE

I, Alexandria Ilene Kabitzke, declare as follows:

1. I am a Named Plaintiff and Class Representative in the case of *Alexandria Ilene Kabitzke v. Defendant Centro de Salud de la Comunidad de San Ysidro, dba San Ysidro Health*. (San Diego County Case No. 37-2022-00046873) I make this declaration on the basis of my personal knowledge and if asked to testify thereto I could and would do so.

1 2. I was employed by Defendant Centro de Salud de la Comunidad de San Ysidro,
2 dba San Ysidro Health (“Defendant” and/or “San Ysidro”) from on or about May 2019 through
3 on or about September 10, 2021. During my employment with Defendant, I occupied the non-
4 exempt position of Patient Service Representative.

5 3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances
6 that I had against Defendant, I was made aware of the advantages and disadvantages of litigation.
7 I was also made aware of my responsibilities as both a Plaintiff and a class and PAGA
8 representative prior to filing the class action complaint which was filed on or about September 8,
9 2022. I accepted the responsibility and agreed to move forward. I pledged to participate actively
10 in the lawsuit.

11 4. During the litigation of this case, I have continuously interacted with my
12 attorneys to discuss the status of the case. I provided relevant oral and documentary information
13 necessary to prosecute this case. By way of example, I searched for and provided relevant
14 documents pertaining to my employment with Defendant and engaged in multiple discussions
15 with my attorneys regarding my employment. These discussions include, but are not limited to,
16 the following topics: the policies, practices and specific working conditions under Defendant
17 and documents provided by Defendant. I have also had numerous discussions with my attorneys
18 regarding the progress of this case. I have spent approximately 30 to 40 hours assisting my
19 attorneys in their litigation of this case.

20 5. By agreeing to bring this action, I formally accepted the responsibilities of
21 representing the interests of all similarly situated employees in California and willingly chose to
22 assume risks and potential costs that I alone might have to bear if judgement would have been
23 rendered in favor of Defendant.

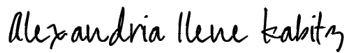
24 6 As part of the settlement agreement, I also signed a general release releasing all
25 claims I have or may have against San Ysidro which is far broader than the release by class
26 members. The class representative service payment also serves as compensation for agreeing to a
27 full, general release of all claims against San Ysidro.
28

7. I also risked the potential stigma of being a named plaintiff in a representative action labor dispute which could affect my further employability in the industry or with any prospective employer who learns of my lawsuit against a former employer.

8. The class representative service payment, subject to court approval, is Ten Thousand Dollars (\$10,000). I believe that this amount is fair and reasonable in light of the risks undertaken (both personal and financial) in litigating this matter as a class action and PAGA representative, as well as the time and effort I have expended in doing so, which have resulted in a favorable outcome to the class members and aggrieved employees.

9. I have not directly experienced negative affect(s) in relation to any further employment opportunities because of this lawsuit. However, I did risk negative effects on my employability when I formally accepted the responsibilities of a class representative and willingly chose to assume significant risks and potential costs that I alone might have had to bear if judgement would have been rendered in favor of Defendant.

I hereby declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 19, 2024, at Eugene, Oregon.

DocuSigned by:

E9C8D1503355456...
 Alexandria Ilene Kabitzke