Vinesign Document ID: 66B18AEF-895D-426D-9153-AF32A2799BEE

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

LYNN HILLEGEIST; MAUREEN LYTLE; PAMELA CASSADY; JOHN SELLERS; HOLLY MILLER; CATHERINE ROBERTSON; BAILEY KILMER, CUAUHTEMOC OLIVO, and JEANELLE WILSON, all individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

ST. JOSEPH HEALTH NORTHERN CALIFORNIA, LLC; ST. JOSEPH HEALTH SYSTEM; PROVIDENCE ST. JOSEPH HEALTH; and DOES 1 THROUGH 20, INCLUSIVE,

Defendants.

Case No. CV2201266

CLASS ACTION

[Case Assigned for All Purposes to Hon. Timothy Canning, Dept: 4]

DECLARATION OF JEANELLE WILSON IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT

The signed document can be validated at https://app.vinesign.com/Verify

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DECLARATION OF JEANELLE WILSON

I, Jeanelle Wilson, declare:

1. I am over the age of 18 and am one of the named Plaintiffs and class representatives in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. This declaration is submitted in support of Preliminary Approval of the Class Action settlement in this matter.

1. I worked for Defendants St. Joseph Health Northern California, LLC; St. Joseph Health System; Providence St. Joseph Health ("Defendants") as a non-exempt hourly employee from approximately March 19, 2009 through the present.

2. From the time of the filing of the lawsuit, I have understood that this is a class action lawsuit where I represent the interests of all current and former non-exempt, hourly employees of Defendants who worked at any time during the Class Period.

3. I believe while working for Defendants, I and all current and former non-exempt, hourly employees of Defendants who worked any time during the Class Period, were subject to the same policies and procedures regarding payment of minimum and overtime wages, sick pay wages, meal and rest breaks, reimbursement of business-related expenses, on wage statements, and final payment of wages. I believe that the claims of all current and former non-exempt, hourly employees of Defendants at any time during the Class Period are identical to mine because Defendants' policies and procedures applied to all of us.

4. I understand that I must continue to consider and protect the interests all current and former non-exempt, hourly employees. I have been protecting the rights of myself and all current and former non-exempt, hourly employees of Defendants who worked at any time during the Class Period, since approximately February of 2018 to June of 2024 when first I started looking for an attorney before this lawsuit was filed. I have been and continue to place the interest of all current and former non-exempt, hourly employees of Defendants who worked at any time during the Class Period above my own. I do not have a conflict with the members of the Class I seek to represent.

5. I provided information and been available to my attorneys since approximately June of 2024 when I was searching for my attorney. I have helped and been willing to support the lawsuit in any way I can for the last approximately 27 months since June of 2024 when I began searching for an attorney for the claims in this lawsuit. I have searched for an attorney, met with my attorneys to see if they would represent me, met with my attorneys to discuss the Defendants' policies, procedures, and practices for clocking in and out, paying wages for the hours that we worked, wage statements, and final payment of wages. I spent time searching for policies and procedures that were given to me during my employment, any timecards I had, any pay stubs I had, W2s, and other documents related to my employment. I produced all the documents to my attorneys. I responded to almost all of my attorneys' telephone calls and interviews and I met with them in person and/or telephonically to discuss any questions they had about my employment, Defendants' policies and procedures, Defendants' paying of minimum and overtime wages, providing wage statements, or the documents I had provided to them. I made myself available during the mediation session. Once the settlement agreement was finalized, I conferred with my attorneys on multiple occasions to review and discuss the agreement before signing.

6. I also understand that in the event this matter proceeds to trial, I must come to court to participate in the trial. I will come to court if I am needed and have been ready to perform any responsibility that is necessary for this lawsuit. I know that I took a risk by filing this lawsuit because if I lost, I would have to pay for all the costs incurred by the Defendants in the lawsuit. I also have the risk of losing income for any time that I would have to spend fulfilling my responsibilities including having to attend the trial. I also believe I have taken a risk by filing this lawsuit because my employers in the future may find out that I sued my employer, and they may not like it. The other employees will be receiving money from this lawsuit and they have not had to file a lawsuit, look for an attorney, or take the risks that I have had to take.

7. I understand that the settlement we have reached in this case must be approved by the Court and I must protect the interests of all current and former non-exempt, hourly employees of Defendants who worked at any time during the Class Period.

8. I have no knowledge of the existence of a conflict between any of the putative Class Members, the other named Plaintiffs, and myself or my attorneys.

9. I have no interest in nor any actual or potential conflict of interest with settlement administrator ILYM Group, Inc.

10. I am also aware of the fee splitting agreements between Class Counsel and I have signed an acknowledgement regarding this.

I declare under penalty of perjury, under the laws of State of California, that the foregoing is true and correct.

Executed this 18th day of September, 2026, at _____, California.

Jeanelle Wilson