Megan A. Yarnall (CSB #275319)
William H. Stein (CBS #322168)
JANSSEN MALLOY LLP
730 Fifth Street
P.O. Drawer 1288
Eureka, CA 95501
Telephone: (707) 445-2071

Attorneys for Plaintiffs
Lynn Hillegeist; Maureen Lytle; Pamela Cassady; John Sellers; Holly Miller; Catherine Robertson; Bailey Kilmer; Cuahtemoc Olivo; and Janelle Wilson, all individually and on behalf of all others similarly situated.

Additional Counsel on following page.

SUPERIOR COURT OF CALIFORNIA

COUNTY OF HUMBOLDT

LYNN HILLEGEIST; MAUREEN LYTLE; PAMELA CASSADY; JOHN SELLERS; HOLLY MILLER; CATHERINE ROBERTSON; BAILEY KILMER, CUAUHTEMOC OLIVO, and JANELLE 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 LYNN HILLEGEIST'S DECLARATION IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT

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BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP
Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Aparajit Bhowmik (State Bar #248066)
Nicholas J. De Blouw (State Bar #280922)
Sergio J. Puche (State Bar #289437)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Website: www.bamlawca.com

Joseph Lavi, Esq. (SBN 209776)
Vincent C. Granberry, Esq. (SBN 276483)
Cassandra A. Castro, Esq. (SBN 334238)
LAVI & EBRAHIMIAN, LLP
8889 W. Olympic Boulevard, Suite 200
Beverly Hills, California 90211
Telephone: (310) 432-0000
Facsimile: (310) 432-0001
jlavi@lelawfirm.com
vgranberry@lelawfirm.com
ccastro@lelawfirm.com

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I, Lynn Hillegeist, declare:

1. I am over the age of 18 and am one of the named Plaintiffs and proposed class representatives in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I could and would competently testify thereto.
2. This declaration is submitted in support of Preliminary approval of the class action and PAGA settlement in this matter.
3. I have worked for Defendant St. Joseph Health Northern California, LLC as a non-exempt hourly employee from approximately June of 2007 to the present at Providence Redwood Memorial Hospital in Fortuna, California.
4. I have understood that this lawsuit was brought as a putative class action and that I, together with the other named Plaintiffs, seek to represent the interests of all individuals who are or previously were employed as non-exempt employees who worked for Defendants St. Joseph Health Northern California, LLC, St. Joseph Health System, and Providence St. Joseph Health, (hereinafter "Defendants") during the Class Period, excluding all non-exempt employees who worked for Defendant St. Joseph Health Northern California, LLC dba St. Joseph Hospital – Eureka between August 24, 2018 and March 25, 2022 and who were not employed by Defendants at any other time during the Class Period and who did not opt-out of the Martinez v. St. Joseph Health Northern California, LLC (Humboldt County Superior Court Case No. CV-20000424) class action settlement. I understand that the Class Period is defined as February 28, 2018 through February 9, 2026.
5. During my employment, I was subject to Defendants' policies and practices concerning the payment of minimum and overtime wages, sick pay, meal and rest breaks, reimbursement of business-related expenses, wage statements, and final payment of wages. Based on my own experiences and what I have learned through my participation in this lawsuit, I understand that the claims asserted in this case concern policies and practices that applied to other non-exempt, hourly employees of Defendants during the Class Period. I understand that the claims of the other putative class members arise from the same or similar policies and practices as my own claims.

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6. I understand that, if appointed as a class representative, I have a responsibility to fairly represent and protect the interests of the Settlement Class. I have kept the interests of the other class members in mind throughout this litigation and in considering the proposed settlement. I am not aware of any conflict between my interests and the interests of the class members I seek to represent.

7. I have actively participated in this case since approximately August of 2022, when I first began considering legal action and seeking counsel. I have met and spoken with my attorneys on numerous occasions regarding my employment with Defendants and the facts and claims at issue in this case. I have reviewed my wage statements both independently and with my attorneys, and I searched for and provided my attorneys with documents in my possession relating to my employment, including policies and procedures, time records, wage statements, W-2s, and other employment-related documents. I have also discussed with my attorneys Defendants' policies and practices concerning timekeeping, payment of wages, wage statements, and final payment of wages. I made myself available to participate in the full-day mediation in December 2025 and in the settlement discussions related to that mediation. After a settlement was reached, my attorneys explained the material terms of the proposed settlement to me, and I had the opportunity to ask questions and discuss those terms with them. I also reviewed and discussed the memorandum of understanding and the long-form settlement agreement with my attorneys before signing them. I understand the material terms of the proposed settlement, believe the settlement is fair and reasonable, and support its approval by the Court.

8. I understand that serving as a named Plaintiff and proposed class representative requires me to devote time and attention to this case and to remain available as needed throughout the litigation. I understand that, if this matter were to proceed to trial, I could be required to appear in court and participate in the trial, and I have been prepared to do so. I also understood when I agreed to serve as a named Plaintiff that my participation in this lawsuit would be a matter of public record and could require me to take time away from work and other responsibilities. I accepted these obligations in pursuing this case on behalf of myself

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and the other putative class members. If the settlement is approved, members of the Settlement Class will be able to receive the benefits of the settlement without having to file their own lawsuits or assume the obligations associated with serving as a named plaintiff.

9. I have no interest in, or actual or potential conflict of interest with, the settlement administrator, ILYM Group, Inc.

10. I am not aware of any other pending matter or action asserting claims that will be extinguished or otherwise adversely affected by the proposed Settlement in this action.

11. I have been informed of the agreements among Class Counsel regarding the division of attorneys' fees and have provided my written consent to those agreements.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct and that this declaration was executed on October 08, 2026, in McKinleyville, California.

Lynn Hillegeist

Lynn Hillegeist

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