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Attorneys for Plaintiff
MICHELLE GAFFNEY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SHASTA

MICHELLE GAFFNEY, on behalf of
themselves and all others similarly situated
and the general public,

Plaintiffs,

v.

PRIME HEALTHCARE SERVICES –
SHASTA, LLC dba SHASTA REGIONAL
MEDICAL CENTER, a Delaware limited
liability company; and DOES 1 to 100,

Defendant.

Gaffney Case No. 23CV0202050
Hon. Stephen H. Baker
Dept. 64

**DECLARATION OF MICHELLE GAFFNEY
IN SUPPORT OF COURT APPROVAL OF
PAGA SETTLEMENT**

Action filed: December 27, 2022

I, Michelle Gaffney, declare:

1. I am the Plaintiff in this action. The following is based on my personal knowledge, and if called as a witness, I would and could competently testify.

2. I started my employment with Shasta Regional Medical Center as a Patient Care Technician in 2004 and became a Registered Nurse (RN) in 2015. During my employment with SRMC I have worked 12-hour shifts in the ICU department as an RN.

3. During the pendency of this case, I spent time with my attorneys discussing the nature of my complaints and the state of my case. I have assisted in the prosecution of this case by reviewing my own documents with the attorneys, identifying witnesses, reviewing documents from my attorneys, and answering discovery while the case was in arbitration. I participated in the mediation of this case telephonically and only gave my approval to settle after being fully informed by my counsel.

4. I understood that this action was being prosecuted on behalf of the State of California as a private attorney general, on my behalf, and for other aggrieved employees. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including frequently discussing the case with them and providing them with information. On the many occasions I have spoken with my counsel, I explained the company's policies and practices, as well as reviewing Defendant's produced documents. Further, I was involved in the negotiations that led to the settlement. I also reviewed and signed the Settlement Agreement, and this Declaration. Throughout this nearly three-year old case, I have continuously been kept apprised of the case status and was willing to take this matter to trial after my individual arbitration.

5. I was aware that the mere filing of the action and participation could jeopardize my future employability.

6. I am aware and have been aware from the inception of the case, that there is the risk that if I did not win, then I could be liable for Defendant's costs. I accepted that risk.

7. I understood from the inception of the case that a representative lawsuit could take longer than an individual action and I accepted that burden.

8. I believe that the settlement is fair, adequate, and reasonable for the aggrieved employees and the State of California. I am proud of the result and accomplishment of this lawsuit given the procedural posture of this case and the likelihood of recovery at trial.

9. I support my attorneys' request for fees as I believe the attorney fee request of \$266,664.64 to be reasonable in light of the excellent work and favorable result my attorneys achieved for me and the aggrieved employees. I understand that the attorneys are requesting to be awarded attorneys' fees of 33.33% of the gross settlement fund of \$800,000.00. The request of 33.33% is fair and reasonable especially in light of the work performed and the excellent result received. I also understand that my lawyers from Janelle Carney – Attorney at Law, APC and Salusky Law Group have spent not less than 200 hours on the case. I recognize that the attorneys will spend more time on this case throughout the final distribution over the course of the next few months. I agree that my attorneys' fee request of \$850.00 an hour for Janelle Carney of Janelle Carney Attorney at Law, APC, \$850.00 an hour for Anna R. Salusky of Salusky Law Group, APC, are fair and reasonable hourly rates that I agreed upon when I retained counsel. I further support my attorneys' request for reimbursement of all costs of up to \$55,000.00. Accordingly, I do believe that the attorneys' costs request of a maximum amount of up to \$55,000.00 should be approved as reasonable and necessary.

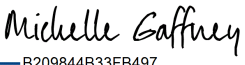
10. I signed a Joint Prosecution Agreement approving the following fee split between my counsel's firms and the other lawyers in the related matters:

<u>Attorney</u>	<u>Percentage of Fee Award</u>
Schneider Wallace Cottrell Konecky LLP ("SWCK")	50%
Janelle Carney – Attorney at Law APC and Salusky Law Group	25%
Lavi & Ebrahimian	25%

11. Based on the excellent result, I reiterate my full support for the entirety of the settlement and request that the Court enter the proposed Approval Order.

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

Executed at Shasta Lake, California, on 12/2/2025

Signed by:

B209844B33FB497
 Michelle Gaffney