

KINGSLEY SZAMET & LY

ERIC B. KINGSLEY, Esq. (SBN 185123)

eric@kingsleylawyers.com

KELSEY M. SZAMET, Esq. (SBN 260264)

kelsey@kingsleylawyers.com

JESSICA BULAON, Esq. (SBN 340749)

jessi@kingsleylawyers.com

16133 Ventura Blvd., Suite 1200

Encino, CA 91436

Telephone: (818) 990-8300

Fax: (818) 990-2903

Attorneys for Plaintiff and the aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

CARLOS BARRAZA an individual, on
behalf of State of California, as a private
attorney general,

PLAINTIFF,

v.

ALTA NEWPORT HOSPITAL, LLC DBA
FOOTHILL REGIONAL MEDICAL
CENTER; and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 30-2023-01304199-CU-OE-CXC

[Case Assigned for All Purposes to Hon. Lon
Hurwitz in Dept. CX-103]

**SUPPLEMENTAL DECLARATION OF
CARLOS BARRAZA IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF REPRESENTATIVE ACTION
SETTLEMENT**

Date: June 12, 2025

Time: 2:00 P.M.

Dept.: CX-102

Complaint Filed: January 26, 2023

FAC Filed: April 3, 2023

SAC Filed: September 16, 2024

Trial Date: None Set

1 **SUPPLEMENTAL DECLARATION OF CARLOS BARRAZA**

2 I, Carlos Barraza, state and declare as follows:

3 1. I am a competent adult, over the age of eighteen and the name Plaintiff in the matter
4 of CARLOS BARRAZA, an individual, on behalf of the State of California, as a private attorney
5 general, v. Alta Newport Hospital, LLC dba Foothill Regional Medical Center; and DOES 1 thru
6 50, inclusive, Orange County Superior Court, Case No. 30-2023-01304199-CU-OE-CXC. The
7 foregoing is based upon my personal knowledge and, if called as a witness, I could and would
8 competently testify thereto.

9 2. I am making this sworn supplemental declaration in support of my claims and the
10 claim of my co-workers, and in support of my qualifications as Plaintiff. If called as a witness, I
11 could and would competently testify as to the truth of the matters set forth herein.

12 3. I have spent significant time throughout this Action working with PAGA Counsel,
13 between 15-20 hours. Before filing this action, in January 26, 2023, I spent several hours
14 researching and identifying Counsel that I believed could best represent the interests of the PAGA
15 Employees. I spoke to multiple different attorneys on the phone before making a decision as to
16 who would best represent me and others.

17 4. I also assisted the attorneys with investigation and gathering of information before
18 initiating the lawsuit including discussing my work experience and the experience of others that I
19 had observed while working for Alta Newport and provided all relevant employment documents
20 in my possession.

21 5. Once the lawsuit started, I continued to assist and be involved. I had several phone
22 calls with my lawyers to assist and to get updates on the case. In addition, I attended a full-day
23 mediation on June 11, 2024 via teleconference. During the mediation, I actively participated in the
24 discussions with my counsel and shared my knowledge and insights in order to help all of the
25 PAGA Employees obtain a favorable settlement. I also reviewed various settlement and related
26 documents, such as the settlement agreement and my initial declaration in support of this
27 settlement before signing it. I accepted the settlement only after I had spent time evaluating the
28 proposed outcome to assure that it was fair and once PAGA Counsel explained in detail how the

1 settlement would work.

2 6. Throughout the entirety of this litigation, I have maintained regular contact with
3 PAGA Counsel and assisted in any way possible by providing information and making myself
4 available as needed.

5 7. I was aware that by helping to initiate this lawsuit, my name would become known
6 and it was possible that my involvement in this matter could make it more difficult for me to obtain
7 employment in this field. Regardless, I believed it was important to proceed with this matter on
8 my behalf and on behalf of all others who were subject to the same problems during their
9 employment with Alta Newport.

10 8. Based upon my participation in this case, I understand the merits of this settlement
11 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
12 of the PAGA Employees. I believe this Settlement will benefit the PAGA Employees.

13 9. It is my opinion that a fair and adequate enhancement for me as a Plaintiff is \$5,000.
14 I believe that it is fair and reasonable in view of all of the work I have performed in my role as a
15 named Plaintiff. As Plaintiff, I actively participated in all stages of the litigation as detailed above
16 and have always maintained the best interest of the PAGA Employees while performing my named
17 Plaintiff duties.

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

20 Executed this 13 day of May, 2025 at Orange,
21 California. (City)

22
23 

24 Carlos Barraza
25 Declarant
26
27
28

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On May 13, 2025, I served all interested parties in this action the following documents described as: **SUPPLEMENTAL DECLARATION OF CARLOS BARRAZA IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

RUTAN & TUCKER

Peter Hering

phering@rutan.com

Adrianna A. Rubino

arubino@rutan.com

Vicky Huang

vhuang@rutan.com

18575 Jamboree Road, 9th Floor

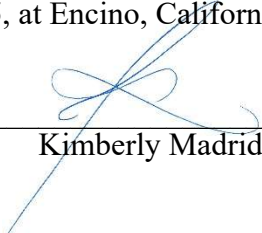
Irvine, CA 92612

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.govfa.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 13, 2025, at Encino, California.



Kimberly Madrid