

Matthew S. Da Vega (SBN 195443)
Matthew H. Fisher (SBN 229532)
DAVEGA | FISHER | MECHTENBERG LLP
232 E. Anapamu St.
Santa Barbara, CA 93101
Telephone: (805) 232-4471
Facsimile: (877) 535-9358
mdavega@mdmflaw.com

Attorneys for Plaintiffs and Proposed Plaintiffs Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

CATHRYN-LUCY PRICE and MICHELLE
PONO, on behalf of herself and all others
similarly situated,

Plaintiffs,

vs.

AMN HEALTHCARE, INC.; AMN
SERVICES, LLC, and DOES 1-100,
inclusive,

Defendants.

Case No.: 37-2018-00017996-CU-OE-CTL

CLASS and REPRESENTATIVE ACTION

**DECLARATION OF CATHRYN-LUCY
PRICE IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Assigned For All Purposes to the Honorable
Gregory W. Pollack (Dept. C-71)

Date: March 24, 2023

Time: 9:30 a.m.

Location: Dept. C-71 (Hon. Gregory W.
Pollack)

DECLARATION OF CATHRYN-LUCY PRICE

I, CATHRYN-LUCY PRICE, hereby declare as follows:

1. I am a named Plaintiff and Proposed Class Representative in this case. I am a former employee of Defendant AMN (“Defendant” or “AMN”). As such, I have personal knowledge of, or am informed and believe, the following facts herein stated. If called as a witness. I could and would testify competently to the following:

JOB DUTIES and EXPERIENCE

2. I worked for Defendant as a Credentialing Analyst during the “Settlement Class Period” (April 11, 2014 through the date that the Court issues its order granting preliminary

1 approval of the settlement. ["Approval Date"]). I worked for Defendant from approximately
2 August 2016 until February 8, 2018. I held the job position of Credentialing Analyst which is one
3 of the job titles that is at issue in this case and which is included within the Settlement Class.

4 DUTIES OF A CLASS REPRESENTATIVE

5 3. This lawsuit is not an individual lawsuit. It is a proposed class action and PAGA
6 case. I understand that, if approved as a Class Representative in this matter, I have an obligation
7 to do my best to look out for the interests of other Class Members (the current and former
8 Credentialing Analyst employees) who I am seeking to represent. I understand that my
9 obligations to the Class Members exist even when the Class is certified solely as part of this
10 proposed class action settlement. It is my understanding that, as one part of this duty to the Class,
11 I cannot agree to a settlement to benefit myself to the exclusion of the rest of the Class Members.
12 To that end I have never asked my attorneys (Da Vega Fisher Mechtenberg, LLP ["DFM LLP"])
13 to settle this matter for my own benefit but done my best to adequately and fairly represent the all
14 the Class Members. I have asked DFM LLP to obtain the best settlement they could for all the
15 Class Members, and I believe that they have attempted to do so.

16 5. I have been involved with this case since its beginning and I am the proposed
17 Class Representative for Credentialing Analysts. I first contacted my attorney and worked with
18 them directly to gather information and evidence in support of the class action lawsuit. I have
19 never asked to be relieved from my role as a proposed Class Representative. I understand that its
20 my job to be the "stand-in" for other Class Members and must put their interest before my own in
21 pursuing this lawsuit and proposed settlement. I accept these duties and responsibilities and
22 request, when appropriate, that I be approved as the Class Representative for the purposes of the
23 proposed Settlement.

24 6. I have had long discussions with my attorneys about the proposed Settlement both
25 before, during, and after the mediation in this case. I am not an attorney but I understand the risk
26 factors that were considered when evaluating the Settlement including the enormous effort, time,
27 and costs to litigate such class action cases, the risk of losing the case and getting nothing, and the
28 the settlement benefits versus prolonged litigation.

1
2 COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY

3 7. I was a Credentialing Analyst employee of Defendant and was subject to the same
4 pay structure, policies, practices, and rules as all the other Credentialing Analysts who were also
5 non-exempt employees of Defendant.

6 8. I am not aware of anything different about me that would raise unique defenses to
7 my claims, as opposed to the claims of the Class Members. Rather, my claims are based upon the
8 same law and facts that relate to the rest of the Class Members.

9 9. I am not aware of any conflicts of interest I have with other Class Members
10 included in this proposed Settlement. I do not have any personal relationship or family ties to my
11 legal counsel or any officers of this court. I am not involved with any litigation involving other
12 Class Members. I have no other business or legal arrangements/dealings with my legal counsel
13 other than this lawsuit. I have never been promised money to serve as the proposed Class
14 Representative. I have never been a Class Representative in another other class action lawsuit. I
15 do not have any intention to take any action that would place me in a position that is hostile to
16 other Class Members.

17 SERVICE AS A CLASS REPRESENTATIVE

18 10. I have assumed some long-lasting risk in prosecuting this case. Because it is so
19 easy to search for information online these days, I will/have face an increased risk that future
20 employers will discover information about this lawsuit online and have a negative reaction to
21 learning that I sued an employer in the industry. This may make it harder for me to obtain future
22 employment or change jobs for better opportunities.

23 11. I have actively assisted my attorney in all the phases of this litigation to advance
24 the interests of the Class to the best of my abilities. I have kept in constant contact with them
25 throughout this process. My participation began with contacting my attorneys to confirm that I
26 might have a case in that Defendant's policies and practices might be illegal. I also reviewed
27 hundreds of pages of documents (employment files, data, policies, etc.) which I already had or
28 were produced in this litigation by Defendant. I provided relevant documents to my counsel, and I

1 explained those documents and related facts to my counsel to assist them in their review and
2 filing of this case. I was also deposed over several days as part of the lawsuit and I participated
3 in an all day mediation and post-mediation settlement discussions. I also discussed the
4 responsibilities that I would have as a Class Representative with my attorney, including my
5 responsibility to act on behalf of the interests of all proposed Class Members.

6 12. I have devoted a substantial amount of my own time during this litigation to ensure
7 a fair result for the Class Members. This involved ongoing communications and participation with
8 my counsel, reviewing documents, attending the mediation in-person, attending my own
9 deposition and other witness depositions, and numerous phone calls, meetings, and emails with
10 my counsel pre and post mediation.

11 13. After years of litigation, a mediation, numerous depositions, and discovery
12 disputes, the parties eventually negotiated an Memorandum of Understanding (MOU) and then a
13 long-form settlement agreement (Stipulation of Settlement Agreement and Release) ["Settlement"
14 or "Settlement Agreement"] was negotiated, and I reviewed and executed both agreements with
15 my attorneys to ensure that their terms are fair and adequate. I have provided dozens of hours of
16 my time to date and during the course of this lawsuit to ensure a good outcome and Settlement for
17 the best interest of the Class Members.

18 14. In sum, I believe that I have diligently, adequately, and fairly represented the Class
19 Members. I have not placed my own interests above those of any member of the Class but have
20 always and will continue to keep the Class Members' best interests in this litigation until its
21 conclusion. I believe that the proposed Settlement obtained on behalf of the Class Members is
22 fair and reasonable in light of the issues involved in this case.

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

25
26 **DATED:** March 2, 2023

By: _____

DocuSigned by:

63E2D86F8CEE489

CATHRYN-LUCY PRICE
Plaintiff / Proposed Class Representative