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Attorneys for Defendant
HARKINS ADMINISTRATIVE SERVICES, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

SARAI CORADO, an individual; on behalf of
herself and all others similarly situated and the
general public,

Plaintiffs,

vs.

Harkins Administrative Services, Inc., a
corporation; and DOES 1 to 100, inclusive,

Defendants.

Case No. CVRI2302159

**DECLARATION OF KRISTEN HAMMON
IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Assigned to the Hon. Harold W. Hopp
Dept.: 1

Date: December 3, 2024
Time: 8:30 a.m.

DECLARATION OF KRISTEN HAMMON

I, Kristen Hammon, declare as follows:

1. I am currently employed as the Human Resources Business Partner Manager for Harkins Administrative Services, Inc. ("Harkins"), the defendant in the above-captioned action. I have held this position since December 2023. In my capacity as Human Resources Business Partner Manager, I have personal knowledge, or have confirmed through review of relevant business records, which are kept in the ordinary course of business, the facts contained in this declaration. I am over the age of eighteen, and, if called upon as a witness, I could and would competently testify as to each of the facts set forth herein.

2. I am submitting this declaration in support of Plaintiff Sarai Corado's ("Plaintiff") Motion for Preliminary Approval of Class Action and PAGA Settlement (the "Motion"), as required by the Court's Case Management Order #1 paragraph G(3)(k)(ii).

3. Harkins currently employs approximately 380 non-exempt employees in California. There are approximately 1,277 current and former non-exempt employees of Harkins who are class members in the above-captioned action, based on data through the parties' mediation on May 15, 2024.

4. The likely age of Harkins' non-exempt employees in California ranges from 18 years old to 68 years old.

5. The likely education level of Harkins' non-exempt employees in California varies from some or all of high school to some post-high school education.

6. While I am unable to obtain an exact percentage of Harkins' non-exempt employees in California who are native Spanish-speakers, my understanding is that some are. Therefore, I am informed that the proposed settlement administrator in this action will be translating the notice form, objection form, and exclusion form into Spanish to help ensure that employees can read and understand those documents.

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

3 Executed this 28th day of October, 2024.



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Kristen Hammon