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(Additional Counsel on Next Page)

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN JOAQUIN

STACEY L. GRIMSON, an individual, on behalf of herself and all others similarly situated,

Plaintiff,

v.

PROVIDENT CARE, INC., a California Corporation; and DOES 1-10, Inclusive,

Defendants.

Case No. STK-CV-UOE-2025-0014893
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Blanca Bañuelos
Department 10B

CLASS AND REPRESENTATIVE ACTION

DECLARATION OF STACEY L. GRIMSON IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT

Date: TBD
Time: 9:00 a.m.
Dept.: 10B

Complaint filed: October 10, 2025
Trial date: Not Set

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Attorneys for Plaintiff on behalf of herself
and all others similarly situated

I, Stacey L. Grimson, declare as follows:

1. I am the named plaintiff in this class and representative action against Defendant Provident Care, Inc. ("Defendant" or "Provident") and make this declaration in support of the Class and Representative Action Settlement. I have personal knowledge of the facts stated in this declaration, except as to those matters stated upon information or belief, and, as to those matters, I believe them to be true. If called as a witness, I could and would testify truthfully and competently to the matters stated in this Declaration.

2. I am in no way related to anyone associated with or who works for The Markham Law Firm, Cohelan Khoury & Singer, or United Employees Law Group.

3. I worked for Provident as a non-exempt In-Home Health Care Worker from approximately June 2024 to August 2025. I was responsible for assisting clients with daily living activities, bathing, meal-prepping, house cleaning, hourly in-bed rotations, changing clothes, monitoring their well-being, and ensuring services are delivered in accordance with their care plans, among other duties.

4. During my employment with the Defendant, I decided to consult with an attorney. I felt I was treated unfairly and not paid for all time worked and not provided with the meal and rest breaks that I was entitled to, among similar claims. I initially spoke with the attorneys at Markham Law Firm and United Employees Law Group, and later with the attorneys at Cohelan Khoury & Singer, and told them about everything I had experienced while working for the Defendant. I decided to become a named plaintiff in a class action against the Defendant. My attorneys explained the duties and responsibilities of a class representative to me, and I decided to undertake this role for the benefit of other employees of Provident who experienced the same issues that I had experienced.

5. In the complaint I brought against the Defendant, I alleged that I was not paid for all hours worked, including for time worked during meal periods. Additionally, I alleged in my complaint that I was frequently interrupted, remained on call and/or called back to work during my meal and rest breaks to assist in urgent care and patient services due to lack of relief. I was not paid for that time worked and/or all of the premium payments I was entitled to. I also alleged that I was

not reimbursed for expenses I incurred, including using my personal cell phone and vehicle to perform my work duties.

6. I hoped that by filing this lawsuit, the Defendant would pay their employees for all hours worked, provide employees with their timely and uninterrupted meal and rest breaks as required by California law, and reimburse its employees for necessarily incurred expenses.

7. I was very happy to learn that the case had settled on a class-wide and representative basis, and it resulted in a settlement amount of $150,000.00 from which payments will be made to settlement class members/aggrieved employees. I think this is an excellent result. I am proud that because I felt that something was wrong and decided to do something about it, the other employees will benefit financially.

8. I have devoted a lot of time to this case since the case has been pending. I have spent many hours searching for documents, and reviewing documents my attorneys asked me to review. I spent a lot of time answering my attorneys' questions by phone, emails, and text messages about this case, including specifically extensive communications and documentation regarding my job duties and estimated time allocations. I had to recall everything I could remember about these job duties and the issues I experienced during my employment.

9. I was on standby for a full-day neutral evaluation conference and then a follow-up conference set for a second date. During the conferences, I had to be available if my attorneys called or emailed me, asking questions pertaining to my claims in this case.

10. I did my best to be available to my attorneys to answer any questions they had or provide any information they needed. I returned their phone calls as promptly as I could and answered any questions to the best of my ability. I complied with my attorneys' requests to review documents and provide necessary information.

11. By filing this lawsuit, I understood the risks involved. I now bear the stigma of bringing a class action wage dispute against my employer. Additionally, given the internet, it is quite likely that any potential future employers or professional affiliations might find out simply by "googling" my name that I acted as a class representative in this action against my employer. Regardless, I am happy to know that the time, effort, and information I provided helped to make

this settlement possible.

12. I am also aware that if I lost this case, I might have been responsible for the Defendant's costs of defending this case. This added to the stress of assuming the role of a named plaintiff in this case.

13. At times, it was a challenge for me to participate in this case due to my work schedule and while maintaining my other professional and personal responsibilities. Additionally, I have had to deal with significant uncertainty and stress from an injury I experienced to my back, from which I was placed on temporary disability. My injury and resulting work limitations made it difficult for me to search for and secure new employment, adding to the uncertainty and stress I was already experiencing. The demands of this lawsuit further compounded that stress while I was navigating these personal and professional challenges. Nevertheless, I believe my efforts and dedication to this lawsuit benefited the LWDA and other aggrieved employees and class members. For all of the reasons above, I believe I deserve a Service Award of $15,000.

14. I have no conflict of interest with any other aggrieved employees or class members. I will not receive any other compensation from Defendant other than the amount the Court awards for my Service Award, and any share of the settlement that I am entitled to as a class member/aggrieved employee.

15. I will supplement this declaration at the final approval stage and provide more information regarding the extent of my participation in this action. I remain committed to the Settlement process and will provide any further information as requested by the Court.

I declare under the penalty of perjury under the laws of United States and the State of California that the foregoing is true and correct and that this declaration is executed on Oct 08, 2 _____, in Manteca, California.

Stacey Grimson (Oct 8, 2026 17:01:09 PDT)

Stacey Grimson