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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MADERA**

KELLY SCHARTON and CHRISTA HORN,
individually, and on behalf of all others similarly
situated, and on behalf of the State of California
and other aggrieved persons,

Plaintiffs,

v.

OAKHURST NURSING AND REHAB
CENTER, LLC, a California limited liability
company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: MCV090222

*Assigned for All Purposes to:
Hon. Michael Jurkovich
Dept. 411B*

**DECLARATION OF CHRISTA HORN IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

PRELIMINARY APPROVAL HEARING:

Date: March 16, 2026
Time: 8:30 a.m.
Dept.: 411B

I, Christa Horn, hereby declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Defendant Oakhurst Nursing and Rehab Center, LLC (“Defendant”) as an hourly-paid, non-exempt social services director and at some point, housekeeper and medical records administrator from around November 2022 to May 2024.

3. Based on my experience and knowledge of Defendant’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of Defendant.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of Defendant. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the hourly-paid, non-exempt employees of Defendant.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Defendant’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Defendant.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

7. Further, when I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendant and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Defendant, and that by doing so, I would be delaying

more immediate recovery available to me through the Labor Commissioner's office.

8. I was also made aware that being a class representative and private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a class representative and private attorney general, I might be responsible for some or all of Defendant's legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

9. I understood that there were risks involved in class and representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

10. As the named plaintiff, I am the face of the litigation. As of the date of this declaration, the class notice will be mailed in this case to approximately 251 current and former employees of Defendant, which will inform them that I filed a class and representative action against Defendant. Exposing myself to this kind of publicity creates a risk for my future career prospects, since current and former employees of Defendant may move to different companies within the industry or may know people at other companies within the industry who may not wish to hire someone who sued her employer. I also understand that having filed this lawsuit in court means that there is now a permanent public record of this lawsuit available to the general public. Given this additional exposure, there is further risk to my future career prospects.

Amount of Time and Effort Spent and Duration of the Litigation

11. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid, non-exempt employees by joining this lawsuit and have spent a substantial amount

1 of time and effort on this litigation. My work on this case has specifically included, among other
2 things, searching/gathering and providing my payroll records and other documents and information
3 to my attorneys, discussing potential witnesses, keeping in regular contact with my attorneys
4 regarding the status of the case, assisting my attorneys prepare for mediation (i.e., reviewing
5 discovery information and data (if needed), discussing my claims and experience), being on-call for
6 my attorneys on the date of mediation in case questions or concerns arose during mediation, and
7 participating in settlement discussions. After mediation, I remained actively involved by reviewing
8 the settlement papers and contacting my counsel for updates. I estimate that since I retained my
9 counsel in November 2024, I have spent approximately 30-35 hours on the activities described above.
10 And I estimate that I will spend an additional 1-5 hours assisting my attorneys through the approval
11 process and staying up to date with the case through disbursement of the settlement checks.

12 **Personal Benefit Received as a Result of the Litigation**

13 12. Absent the requested service payment, the personal benefit I will receive is the same
14 as all other employees. But unlike the other employees, who are only releasing the wage and hour
15 claims asserted in the lawsuit, I have signed a general release of claims as to Defendant.

16 13. I will continue to actively participate in this lawsuit as necessary, and will continue
17 to make myself available to assist in this case moving forward as needed.

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 on 2/23/2026, at Coarse Gold, California.

21 Signed by:

22 CHRISTA HORN

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