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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**
10

11 POUL BEDRI, an individual;

12 Plaintiff,

13 vs.

14 CITY OF HOPE NATIONAL MEDICAL
15 CENTER, a California non-profit corporation;
16 and DOES 1 through 50,

17 Defendants.
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Case No.: 23STCV23713

[Assigned for All Purposes to:
Hon. Lia Martin, Dept. 3]

**DECLARATION OF POUL BEDRI IN
SUPPORT OF MOTION FOR
ATTORNEY'S FEES AND COSTS,
AND CLASS REPRESENTATIVE
SERVICE PAYMENT**

(Filed concurrently with Motion for
Attorney's Fees and Costs and Class
Representative Service Payment;
Supporting Declarations; and
[Proposed] Judgment and Order; [Proposed]
Order)

DATE: January 8, 2026
TIME: 9:00 a.m.
DEPT: 3

Action Filed: September 29, 2023
Trial Date: Not Set

1 I, Poul Bedri, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. This declaration is submitted in support of approval of the proposed class action
4 settlement (“Settlement”) reached in this case. I have personal knowledge of the facts contained in
5 this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I was employed by Defendant City of Hope National Medical Center (“Defendant”)
7 as a non-exempt employee and Sterile Processing Technician from approximately January 2022 to
8 approximately March 2023. During my employment with Defendant, I was subject to Defendant’s
9 wage and hour policies and practices that are at issue in this case.

10 3. Specifically, I was subject to Defendant’s policies on incentive compensation, where
11 I earned incentive compensation and believe Defendant did not properly calculate my rates of pay
12 for overtime, meal/rest period premiums, and paid sick leave; I sometimes worked off the clock pre-
13 shift and during off-the-clock meal periods and was not paid all wages due to me; I regularly took
14 meal periods late because my department was short staffed; and I regularly missed second rest
15 breaks due to lack of coverage. I believe I was not paid all wages and premiums due to me as a
16 result of Defendant’s policies and practices stated above and was not provided accurate wage
17 statements with the correct amount of wages due to me and hours I worked. I believe other non-
18 exempt employees of Defendant were subject to the same policies and procedures discussed above.

19 4. I have been actively involved in this case since I first retained Justice for Workers,
20 P.C. (“JFW”) in July 2023. Without waiving the attorney-client privilege, prior to filing this lawsuit,
21 my attorneys explained my role and responsibilities as a PAGA representative and later explained
22 my role and responsibilities as a Class Representative when we agreed to settle the Action on a class
23 and PAGA basis. I understand my responsibilities as the Class and PAGA Representative. Since
24 retaining my attorneys, I have had many discussions with the attorneys and staff at JFW, including
25 discussions regarding Defendant’s wage and hour practices and my claims in this case, potential
26 witnesses, litigation strategy, updates on how the case was proceeding, the Settlement, and how I
27 could help the case and potential Class Members. I also gathered and reviewed documents for use in
28 the lawsuit and reviewed relevant documents with my attorneys. I estimate that I have spent at least

1 20 hours on this case from the time I first spoke with my attorneys regarding this case until the
2 present. I also understand that as part of the Settlement, I have agreed to a general release of claims
3 against Defendant, which is broader than the release of claims agreed to by other Class Members.
4 As far as I am aware, I have no actual or potential conflicts with any Class Members.

5 5. I understand that my attorneys will request that the Court approve a service award
6 of \$2,000 for my efforts on behalf of the Class. I believe this amount is reasonable based on the
7 amount of time and effort I have devoted to this case, the risks I have undertaken as a Class and
8 PAGA Representative, and my general release of claims, as described above. My support for the
9 Settlement is not contingent on my receiving this service award.

10 6. I am not aware of any other pending matter asserting claims that will be extinguished
11 or affected by the Settlement. I have not previously filed a class and/or PAGA representative action.

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

14 Executed on January 22, 2025 at Monrovia, California.

15
16 *Bedri Poul*

17
18 Poul Bedri