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Attorneys for Plaintiffs

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

ANGELA PORTILLO and KISHA
VAZQUEZ, individuals, on behalf of
themselves and on behalf of all persons
similarly situated, and on behalf of the State
of California, as a private attorney general,

Plaintiffs,

vs.

ORCHARD HOSPITAL, a California
Corporation; ORCHARD GRIDLEY
HOSPITAL, INC., a Corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: **23CV03393**
[Consolidated with 24CV00173 and
24CV00755]

CLASS ACTION

Assigned for All Purposes To:
Judge: Hon. Stephen E. Benson
Dept.: 6

**DECLARATION OF KISHA VAZQUEZ
IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA SETTLEMENT**

Hearing Date: March 25, 2026
Hearing Time: 9:00 a.m.

Date Action Filed: December 7, 2023
Trial Date: Not set

DECLARATION OF KISHA VAZQUEZ

I, KISHA VAZQUEZ, declare:

1. I am over the age of eighteen and I submit this Declaration in support of the Motion for Preliminary Approval of the Class Action and PAGA Settlement in this matter. I have personal knowledge of the facts herein, and if called as a witness I could and would competently testify to them.

2. I am currently a resident of Live Oak, California. I worked as a non-exempt, hourly medical assistant at one of Defendants' facilities and locations in Gridley, California as a nonexempt employee from approximately February 14, 2023, to December 05, 2023. I retained the law firm of D.Law, Inc. to represent me in this class action lawsuit against Defendants for the alleged practices and violations as stated in the operative Complaint in this action.

3. I believe that I am similarly situated to all other Class Members who worked for Defendants during the Class Period and who were similarly affected by Defendants' policies and practices regarding Defendants' payment of minimum wages and overtime, meal periods, rest periods, provision of accurate wage statements, final payment of wages to terminated or resigned employees, reimbursement of business expenses, alleged violations of the unfair competition law, and alleged violations under the Private Attorney Generals Act. I believe my claims against Defendants are typical of the other Class Members because I believe the claims asserted in the operative Complaint are also shared by the other Class Members.

4. I understand that I am asking to be approved to serve as a Class Representative for the Settlement Class in this action, which I understand is defined as follows: means all individuals who are or previously were employed by Defendants who were classified as non-exempt in the State of California at any time during the Class Period, which is December 7, 2019 through August 10, 2025.

5. I also understand there are approximately 631 similarly situated employees that satisfy the Class definition. I also understand that I am serving as a representative Plaintiff on behalf of other similarly situated aggrieved employees in California in connection with our class action claims and claims under Labor Code §§ 2698 *et seq.*, the Private Attorneys General Act

1 (“PAGA”) for penalties.

2 6. Additionally, I believe that my interests have been and continue to be aligned with
3 all Class Members, and I have been and am willing to continue to pursue the Class Members'
4 claims vigorously on our collective behalf. As a result, I firmly believe that I do not have any
5 interests that are adverse to the interests of the Class Members.

6 7. As a Class Representative, I believe I have maintained the best interests of the Class
7 Members. I have actively participated in this litigation and have been continuously apprised of the
8 progress of the case. I have provided documents and evidence to Class Counsel in support of the
9 class claims, I have provided Class Counsel with information about Defendants and about the
10 industry generally, reviewed documents, identified witnesses. I have also invested significant time
11 and efforts in performing my duties on behalf of the Class, including preparing for settlement
12 negotiations and speaking to witnesses. I have conferred with Class Counsel to discuss every
13 aspect of this case, consulted Class Counsel throughout the litigation, participated in the mediation
14 process, monitored the progress of the litigation with Class Counsel, and reviewed and signed the
15 Settlement Agreement. I devoted numerous hours of my time to all of the above tasks to vigorously
16 represent the interests of the Settlement Class.

17 8. I believe the Settlement obtained on behalf of the Settlement Class is fair and
18 reasonable in view of the facts, claims and the risk of going through further litigation in this case.

19 9. I entered into a separate individual agreement and provided a general release to
20 Defendants in connection with my individual non-wage and hour claims, and I am also requesting
21 a Representative Enhancement award and service payment from the Class settlement. In my
22 opinion, the requested award of \$10,000.00 is fair and reasonable given the risks I have taken, the
23 tasks I have performed, the time I have invested, and the real benefit which the Class Members
24 will receive from this class action. I view this settlement as fair and reasonable to all Class
25 Members. I believe I have diligently, adequately, and fairly represented the Class Members, and
26 have not placed my interests above any member of the class.

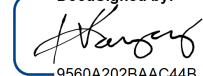
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10. I freely chose to champion the interests of the Class and freely accepted the risks of being a Class Representative in a class action that could stigmatize me and, although unknown at this time, may affect my future employability in this industry or any other industry. I also do not believe my decision to accept the Settlement and proposed \$10,000.00 service payment or for my general release compromised my duty to protect the interest of the Class. I also understand the \$10,000.00 service payment is subject to the Court's approval and discretion. Furthermore, although there is no record of such activity, I accepted the real risk of potentially being liable for the opposing parties' costs and attorneys' fees if I were unsuccessful in this lawsuit.

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

Executed this 25th day of February, 2026 at Live Oak, California.

DocuSigned by:

 9560A202BAAC44B
 KISHA VAZQUEZ