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Attorneys for Plaintiff Tracy Hoge, individually,
and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN**

TRACY HOGE, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

BETHANY HOME SOCIETY OF SAN
JOAQUIN COUNTY, INC.; and DOES 1
through 20, inclusive,

Defendants.

Case No. STK-CV-UOE-2020-0010956
(Lead Case)

[Consolidated with: Case No. STK-CV-UOE-
2021-0010793]

Assigned for All Purposes to:
Department 10C

**DECLARATION OF PLAINTIFF HOGE IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

BLANCA GALEAS, individually and on
behalf of other members of the general public
similarly situated,

Plaintiff,

vs.

BETHANY HOME SOCIETY OF SAN
JOAQUIN COUNTY, INC.; and DOES 1
through 20, inclusive,

Defendants.

1 I, Tracy Hoge, hereby declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify, I
3 could and would do so competently under oath. I make this declaration in support of my Motion for
4 Final Approval of Class Action Settlement.

5 2. I worked for Bethany Home Society of San Joaquin County, Inc. ("Defendant") as a non-
6 exempt employee. I brought my case on behalf of myself and other workers in California who were non-
7 exempt workers of Defendant. While I was working for Defendant, I felt that many of Defendant's
8 employees like myself were not being paid correctly and not being provided all required breaks, and not
9 reimbursed for all work expenses paid for out-of-pocket, among other issues.

10 **Work Performed in the Case**

11 1. Through my attorneys, I initiated the pending class action lawsuit on December 29, 2020.

12 2. I have had many conversations with my attorneys about the class action, the Private
13 Attorneys General Action claim alleged in my case, and my experiences working for Defendant to support
14 my allegations.

15 3. With respect to the work I performed on the case, I participated in many meetings with my
16 attorneys; had conversations with my attorneys via email and telephone calls; and provided my attorneys
17 with information related to my working conditions as a non-exempt employee of Defendant. I additionally
18 provided my attorneys with information regarding my job duties; day-to-day work tasks; Defendant's
19 company structure and operation; and observations of the work conditions of Class Members. This
20 includes frequent conversations with my attorneys regarding the operations of the location where I worked;
21 my job duties from the start of my employment; and the experiences related to myself and other Class
22 Members who were employed by Defendant.

23 4. I searched for and produced all documents in my possession related to my work for
24 Defendant to my attorneys. This includes searching for physical records and communications, emails, text
25 messages, and for all other evidence relevant to my claims and allegations.

26 5. I assisted my attorneys respond to five types of written discovery served by Defendant
27 which requested information and documents in my possession. This includes communications with my
28 attorneys about the discovery, review of the discovery (Requests for Production of Documents; Special

1 interrogatories; Form Interrogatories-General; Form Interrogatories-Employment, and Requests for
2 Admission), preparation of responses to the discovery, preparation of supplemental responses and further
3 supplemental responses to Defendant's written discovery, and searching for records responsive to the
4 discovery requests. I produced over 100 pages of records in response to Defendant's discovery.

5 6. In preparation for the mediation, I spoke with my attorneys on multiple occasions about the
6 status of the case, its strengths and weaknesses, and the evidence. I believed that I assisted them in
7 evaluating the claims and the potential class-wide damages for use at mediation.

8 7. I assisted my attorneys review for information in anticipation of mediation, including
9 discussions with my attorneys to understand the information on the documents received for mediation. I
10 also spent considerable time searching for my work documents and sent these to my attorneys. This
11 includes thoroughly searching for physical and electronic documents and information that were still in my
12 possession.

13 8. I assisted my attorneys interpret and understand the information reflected on the work
14 records and pay stubs, and other documents received by my attorneys through the course of the case and
15 in preparation for mediation. This includes conversations about the pay made to myself and Class
16 Members; about Defendant's timekeeping system and time-punch data; about Defendant's policies and
17 practices in writing and in practice; and about the information reflected on the documents from mine and
18 other Class Member's employment with Defendant. Substantial time was spent assisting my attorneys
19 with these tasks.

20 9. I participated in two mediation sessions by making myself available by phone on the day
21 of each mediation. I spoke with my attorneys to answer questions at mediation and after mediation.

22 10. I reviewed the settlement agreement and discussed the terms with my attorneys. I also
23 reviewed the amendment to the settlement agreement and discussed the terms with my attorneys. Based
24 on my review of the settlement terms and its amendment, conversations with my attorneys, and my
25 understanding of Defendant's operations as a former employee, I believe the settlement in the case is fair
26 and adequate and in the best interest of the employees covered by the settlement.

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Risks and Responsibilities of Filing the Lawsuit

11. When I decided to become involved in this lawsuit as a Class Representative for hourly/non-exempt employees of Defendant, I understood that I was not only seeking compensation for myself, but also for all other class members 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.

12. I was also made aware that being a Class Representative in a class 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, 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 class, but I was nervous about losing and having a judgment filed against me for costs, or losing job opportunities in the future.

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

14. Additionally, the notice of settlement in this case was sent to approximately 852 current and former employees of Defendant. The notice informed all of these employees that I filed a class action lawsuit against the company. 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 do not want to hire someone who sued her employer.

15. Through the date of this declaration, I would estimate that I have spent approximately 130-145 hours searching for documents; communicating with my attorneys about the case, Defendant's company structure and operations, my experience at the company, and facts concerning my employment; assisting my attorneys respond to written discovery and provide supplemental and further supplemental responses; attending and speaking with my attorney's at two mediation sessions; reviewing the settlement agreement and amendment to settlement; making myself available to my attorneys whenever they needed me; and similar related tasks. I anticipate spending additional time working with my attorneys to complete the settlement approval process.

Enhancement Award

16. I believe that I have done everything my attorneys have asked of me, and I have tried to represent the class to the best of my ability. I think my efforts helped to get the result obtained in this case. I understand that I may be entitled to an additional payment for my role as a class representative and my work related to the case. I further understand that this additional payment is not guaranteed and is subject to Court approval. Taking into consideration the time I dedicated to this case and the results achieved through the settlement, I believe that the requested award is reasonable. My opinion about the fairness and adequacy of the settlement in the case is not based on this potential payment.

17. I am not aware of any interests I have that are adverse to the interests of the proposed Class members, and I do not have any conflicts that would keep me from adequately representing the class. I remain committed to prosecuting this case vigorously on behalf of the Class.

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

Dated: July 2, 2025

Signed by:

Tracy Hoge

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Tracy Hoge