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**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.

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,

Defendant.

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

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

Honorable Jayne C. Lee
Department 10C

CLASS ACTION

**DECLARATION OF PLAINTIFF BLANCA
GALEAS IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT, CLASS COUNSEL FEES
PAYMENT, CLASS COUNSEL
LITIGATION EXPENSES PAYMENT,
AND CLASS REPRESENTATIVE
SERVICE PAYMENTS**

Date: July 31, 2025
Time: 9:00 a.m.
Department: 10C

Hoge Complaint Filed: December 29, 2020
Hoge FAC Filed: August 9, 2021
Galeas Complaint Filed: November 19, 2021
Hoge SAC Filed: October 16, 2024
Trial Date: None Set

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Attorneys for Plaintiff Tracy Hoge and the Class

DECLARATION OF BLANCA GALEAS

I, **Blanca Galeas**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned action (“Hoge Action”), and the named plaintiff in the action entitled *Blanca Galeas v. Bethany Home Society of San Joaquin County, Inc.*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2021-0010793 (“Galeas Action”) (together with the Hoge Action, the “Actions”), which was consolidated with the Hoge Action. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Bethany Home Society of San Joaquin County, Inc. (“Defendant”) from approximately February 2017 to approximately June 2020 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing and joining the Actions, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout these matters, I have spent time speaking with my attorneys regarding the matters and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid, non-exempt employees, and helping develop a strategy as to what documents

1 and information to obtain from Defendant. I routinely checked in with my attorneys and their staff
2 to make sure that they had all of my most current information and any additional information that
3 I had obtained.

4 4. Throughout these matters, I was available to answer any questions my attorneys had,
5 and available to speak and meet with my attorneys whenever they needed me. I responded to them
6 as quickly as possible and gave them as much information and identified as many documents as I
7 could. I spent time speaking with my attorneys about the cases, identifying potential witnesses,
8 providing my attorneys with documents and information concerning the cases, and also describing
9 policies, practices, and procedures of Defendant.

10 5. As far as the settlement is concerned, I was available to review documents and
11 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
12 Settlement Agreement and discussed the questions I had regarding the potential settlement with
13 my attorneys before signing the settlement papers.

14 6. I think my efforts helped to get the result obtained in the Actions, and as a potential
15 class and PAGA representative, I respectfully request that the Court award me a service payment
16 for my efforts in pursuing and participating in these matters, as well as my broader release of
17 claims. Taking into consideration the time that I have dedicated to these matters, I believe that this
18 amount is reasonable.

19 7. I am not related to anyone associated with Lawyers *for* Justice, PC and Aegis Law
20 Firm, PC.

21 8. I have not entered into any undisclosed agreements, nor have I received any
22 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
23 the Court awards as a service payment, as well as my share of the settlement as a class member
24 and aggrieved employee.

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

3 Executed this 1st day of November 2024, at Stockton, California.

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An electronic signature box containing a handwritten signature and technical metadata. The metadata includes the text "Electronically Signed", the date and time "2024-11-01 00:17:59 UTC", a unique identifier "174.236.226.206", the text "Nintex AssureSign®", and a long alphanumeric hash "49b63f114d0e-4bf0-8285-b219000a54c5".

Blanca Galeas