

**ELECTRONICALLY FILED**

Superior Court of California

County of Marin

**04/11/2025**

James M. Kim, Clerk of the Court

By: K. Keeton, Deputy

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Attorneys for Plaintiff, MARY WILKER

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MARIN

MARY WILKER, on behalf of herself and all  
others similarly situated,

Plaintiff,

vs.

SAN RAFAEL OPERATING COMPANY,  
LP, a Delaware Limited Partnership;  
MARINER HEALTH CENTRAL, Inc., a  
Delaware Corporation, and DOES 1-100,  
inclusive,

Defendants.

CASE NO. CV0001580

CLASS ACTION

Hon. Stephen Freccero

**DECLARATION OF MARY WILKER IN  
SUPPORT OF MOTION FOR COURT  
APPROVAL OF PAGA SETTLEMENT**

Date: TBD 07/08/2025

Time: TBD 1:30 pm

Dept.: A

Action filed: December 14, 2023

**DECLARATION OF MARY WILKER IN SUPPORT OF MOTION FOR COURT  
APPROVAL OF PAGA SETTLEMENT**

I, Mary Wilker, declare:

1. I am a named Plaintiff in this action. I am an adult over the age of 18. The foregoing is based on my personal knowledge, and if called as a witness, I would and could competently testify thereto.

2. I worked as a non-exempt employee of Defendants since approximately July 1, 2022, at the Pine Ridge location.

3. During the pendency of this case, I have spent time with my attorneys discussing the nature of my complaints and the state of my case. I have assisted in the prosecution of this case by reviewing my own documents with the attorneys, identifying witnesses, reviewing documents from my attorneys, and answering discovery. I participated in the mediation of this case telephonically and only gave my approval to settle after being fully informed by my counsel.

4. I understood that this action was being prosecuted on behalf of the State of California as a private attorney general on my behalf and other aggrieved employees. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including frequently discussing the case with them and providing them with information. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of the company's policies and practices, as well as reviewing Defendant's produced documents. Further, I was involved in the negotiations that led to the settlement in this matter. I also reviewed and signed the Settlement Agreement, and this Declaration. Throughout this case, I have continuously been kept apprised of the case status.

5. I am aware and have been aware from the inception of the case, that there is the risk that if I do not win, then I could be liable for Defendants' costs. I accepted that risk in this case.

6. I understood from the inception of the case that a representative lawsuit could take longer than an individual action and I accepted that burden.

7. I believe that the settlement is fair, adequate, and reasonable for the aggrieved employees and the State of California. I am proud of the result and accomplishment of this lawsuit given the procedural posture of this case and the likelihood of recovery at trial.

8. I support my attorneys' request for fees as I believe the attorney fee request of \$71,750.00 to be reasonable in light of the excellent work and favorable result my attorneys

1 achieved for me and the aggrieved employees. I understand that the attorneys are requesting to be  
2 awarded attorneys' fees of 35% of the gross settlement fund of \$205,000.00. The request of 35% is  
3 fair and reasonable especially in light of the work performed and the excellent result received.

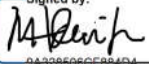
4 9. I signed a Joint Prosecution Agreement approving the following fee split between  
5 my counsel's firms:

| <u>Attorney</u>                      | <u>Percentage of Fee Award</u> |
|--------------------------------------|--------------------------------|
| Janelle Carney – Attorney at Law APC | 50%                            |
| Frontier Law Center                  | 50%                            |

9 10. Based on the excellent result, I reiterate my full support for the entirety of the  
10 settlement and request that the Court enter the proposed Approval Order.

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

14 Executed on 4/11/2025 at Granada Hills, California.

Signed by:   
9A326506GF084B4  
Mary Wilker