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Attorneys for Plaintiffs
 KAREN JOHNSON and MATTHEW JOHNSON

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

KAREN JOHNSON and MATTHEW
 JOHNSON, as individuals and on behalf of
 others similarly situated,

Plaintiffs,

v.

PINE VALLEY BIBLE CONFERENCE
 ASSOCIATION, INC., a California religious
 non-profit corporation; PINE VALLEY CAMP
 CHRISTMAS, a California religious non-profit
 corporation; and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: 37-2024-00002479-CU-OE-CTL

**DECLARATION OF KAREN JOHNSON
 IN SUPPORT OF PLAINTIFF'S MOTION
 FOR PRELIMINARY APPROVAL OF
 CLASS ACTION SETTLEMENT**

Dept: C-62
 Judge: Hon. Judy Bae
 Date Filed: January 19, 2024
 HRG Date: July 31, 2026
 HRG Time: 9:10 a.m.

Filed concurrently with:

1. Notice of Motion and Motion for Preliminary Approval
2. Class Notice
3. Proposed Judgment
4. Declaration of Jennifer Kramer
5. Declaration of Christina Coleman
6. Declaration of Karen Johnson
7. Declaration of Matthew Johnson

DECLARATION OF PLAINTIFF KAREN JOHNSON

I, KAREN JOHNSON, hereby declare as follows:

1. I am over the age of 18, and the Plaintiff in the above-referenced action. The facts set forth herein are true of my own personal knowledge, and if called upon to testify, I could and would competently do so under oath.

2. I am the named Plaintiff in this action. On January 19, 2024, the Class Action Complaint entitled *Johnson v. Pine Valley Bible Conference Association, Inc., et al*, San Diego County Superior Court Case No. 37-2024-00002479-CU-OE-CTL, was filed in the Superior Court of California, County of San Diego, on behalf of Karen Johnson and Matthew Johnson and all other similarly situated and aggrieved.

3. I submit this Declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement. I have been involved in all aspects of this Action since the inception of this case, including prior to filing.

4. I was employed by Defendants on June 23, 2021 until on or about April 20, 2023 as an Administrative Assistant. Part of my duties as an Administrative Assistant consisted of working "Camp Christmas" where I was required work unpaid, mandatory "volunteer" or "and then some" hours. Additionally, I was not afforded uninterrupted meal and rest breaks as I was required to be on-call via walkie talkie or my personal cell phone. Based on my personal observations of my co-workers, I experienced the same employment-related policies and practices that affected other employees of Defendants.

5. As an Administrative Assistant, I have alleged Defendants failed to compensate myself and my co-workers for all hours worked; failed to allow proper meal and rest breaks; failed to indemnify for necessary business expenses; failed to furnish accurate itemized wage statements; and failed to pay all wages owed upon termination.

6. I understand that, as a class representative, I have a fiduciary duty to look out for and protect the interest of the Class as a whole and must put the Class's interests ahead of my own. I do not believe, nor do I have any reason to believe, that my interests in this lawsuit are in conflict or in any way antagonistic to the interests of those of the other Class Members. Given the various

arguments made and defenses asserted by Defendant, I believe that the settlement obtained is a fair, adequate, and reasonable one for the hourly-paid nonexempt temporary laborers in the Class.

7. As a named plaintiff in this action, I provided invaluable assistance to my attorneys, proposed Class Counsel, and the putative Class in this case. Along with my co-Plaintiff, I sought and obtained legal counsel, provided factual background information throughout the litigation such as that used to draft the Complaint and PAGA letters in this action. I also provided documents, participated in mediation, and regularly corresponded with my attorneys to answer questions and concerns that they raised. I have responded to discovery, reviewed documents, and assisted in all phases of litigation. I have been consulted and have discussed each stage of litigation with Class Counsel, including the settlement terms. My efforts were instrumental in securing the favorable terms of the settlement agreement and related documents, which provide monetary compensation to a Class of approximately 109 employees. This settlement also provides monetary compensation and penalties to the Labor and Workforce Development Agency, and approximately 42 PAGA settlement members. I also agreed to participate in this case with no guarantee of personal benefit.

8. This case also involved risks for me, such as the potential risk of having to pay Defendant's costs if we lost. Disregarding these risks, I pursued this case on behalf of the Class to a successful resolution and settlement. Further, as part of the Settlement, I am agreeing to a general release of all claims, which is broader than the release of claims that the members of the class will agree to if they wish to participate in the settlement.

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

Executed 7/7/2026 at Maryville, TN
(Date) (city) (state)

DocuSigned by:
Karen Johnson

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KAREN JOHNSON