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7 Attorneys for Plaintiff CAMILLE JONES

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**

11 CAMILLE JONES, an individual and on
12 behalf of all others similarly situated;
13 Plaintiff,
14 vs.
15 SUTHERLAND HEALTHCARE
SOLUTIONS INC., a Delaware corporation;
16 and DOES 1 through 50,
17 Defendants.

Case No.: 23STCV31445

[Assigned for All Purposes to:
Hon. Samantha P. Jessner, Dept. 7]

**DECLARATION OF CAMILLE JONES
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

(Filed concurrently with Motion for
Preliminary Approval; Supporting
Declarations; and [Proposed] Order)

DATE: September 22, 2026
TIME: 10:00 a.m.
DEPT: 7

Action Filed: December 26, 2023
Trial Date: Not Set

1 I, Camille Jones, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. This declaration is submitted in support of approval of the proposed class action
4 settlement (“Settlement”) reached in this case. I have personal knowledge of the facts contained in
5 this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I was employed by Defendant Sutherland Healthcare Solutions Inc. (“Defendant”) as
7 an hourly-paid, non-exempt employee in the position of remote Associate Account Manager from
8 approximately February 2021 to approximately December 5, 2023. During my employment with
9 Defendant, I was subject to Defendant’s wage and hour policies and practices that are at issue in
10 this case.

11 3. Specifically, I received non-discretionary performance bonuses which I believe were
12 not properly factored into the regular rate pay, I sometimes worked off the clock during my meal
13 breaks without pay, I sometimes could not take compliant meal breaks or and rest breaks because of
14 my job duties, and I had to pay for my home internet for work without reimbursement. As a result
15 of the foregoing issues, I believe I received inaccurate wage statements and was not paid all wages
16 when my employment with Defendant ended. I believe other non-exempt employees of Defendant
17 were subject to the same policies and procedures discussed above and that my claims against
18 Defendant for unpaid wages and statutory and civil penalties are typical of Class Members’ claims.

19 4. I have been actively involved in this case since I first retained Justice for Workers,
20 P.C. (“JFW”) in December 2023. Without waiving the attorney-client privilege, prior to filing this
21 lawsuit, my attorneys explained my role and responsibilities as a Class Representative, and I
22 understand my responsibilities as a Class Representative. Since retaining my attorneys, I have had
23 many discussions and meetings with the attorneys and staff at JFW, discussions regarding
24 Defendant’s wage and hour practices and my claims in this case, litigation strategy, updates on how
25 the case was proceeding, the Settlement, and how I could help the case and potential Class
26 Members. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant
27 documents with my attorneys. I estimate that I have spent at least 20 hours on this case from the
28 time I first spoke with my attorneys regarding this case until the present. I also understand that as

1 part of the Settlement, I have agreed to a general release of claims against Defendant, which is
2 broader than the release of claims agreed to by other Class Members.

3 5. Furthermore, there is no conflict between my interests and the interests of the class
4 that I am seeking to represent. My interests are entirely coextensive with the interests of the Class. I
5 allege that I was injured by the same company-wide policies and practices to which the proposed
6 Class was subjected and seek the same relief. I have already demonstrated my ability to advocate
7 for the interests of the Class by initiating this litigation, undertaking extensive class discovery, and
8 evaluating the proposed settlement to assure that it is fair.

9 6. I understood that at the time I filed this action, as a Class Representative, I owed a
10 duty to the putative class members to faithfully prosecute this action with their best interests at the
11 forefront of every decision. I understood that I could not make any decision in this action for the
12 sole benefit of my personal interest. I understood that in executing this duty, I might have been
13 asked to sacrifice my personal best interests for the benefit of the interests of the putative class
14 members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the
15 broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful
16 wage and hour practices. I believe that I faithfully executed the duties of a Class Representative
17 throughout this litigation and will continue to do until this litigation is fully and finally resolved.

18 7. I understand that my attorneys will request that the Court approve a service award
19 of \$7,500.00 for my efforts on behalf of the Class. I believe this amount is reasonable based on the
20 amount of time and effort I have devoted to this case, the risks I have undertaken as a Class
21 Representative including being sued by Defendant, and my general release of claims, as described
22 above. My support for the Settlement is not contingent on my receiving this service award.

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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 on April 29, 2026 at Los Angeles, California.
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5 *Camille Jones*

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Camille Jones
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