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Attorneys for Plaintiff OLIVIA PASS,
as an individual and on behalf of all employees
similarly situated

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

OLIVIA PASS, and HADIZA JIMADA, as
individuals, and on behalf of all employees
similarly situated,

Plaintiffs,

v.

DEL AMO HOSPITAL, INC., a California
Corporation; UHS OF DELAWARE, INC., a
Delaware corporation; DEL AMO
BEHAVIORAL HEALTH SYSTEM, an
unknown business entity; DEL AMO
BEHAVIORAL HEALTH SYSTEM OF
CALIFORNIA, an unknown business entity
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 24STCV03085

[Assigned for all purposes to Hon. William E.
Weinberger, Dept. 37]

**DECLARATION OF OLIVIA PASS IN
SUPPORT OF PLAINTIFF'S MOTION FOR
AN ORDER APPROVING SETTLEMENT
OF CLAIMS BROUGHT PURSUANT TO
THE PRIVATE ATTORNEY GENERAL'S
ACT OF 2004**

Reservation ID: 476005153224

Date: May 26, 2026

Time: 8:30 a.m.

Courtroom: Dept. 37

Judge: Hon. William E. Weinberger

Action Filed: February 5, 2024

Trial Date: Not Set

DECLARATION OF OLIVIA PASS

I, OLIVIA PASS, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter against Defendant DEL AMO HOSPITAL, INC. (“Defendant”). This declaration is submitted in support of approval of the Settlement Agreement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant as an hourly-paid, non-exempt employee from November 10, 2022 to November 3, 2023.

3. When I worked for Defendant, I was subjected to the same labor code claims involving off the clock, regular rate, meal breaks, rest breaks, wage statements, failure to reimburse necessary business expenses and failure to pay all wages due when I was no longer an employee of Defendant as all other employees.

4. I have been actively involved in this case since I first retained The Sentinel Firm, APC and Tunyan Law, APC. My participation began with bringing certain issues that are involved in this matter to my Counsel’s attention and explaining the factual background that was used to prosecute the claims in this case. I have had many discussions with the attorneys at The Sentinel Firm, APC and Tunyan Law, APC regarding Defendant’s wage and hour policies, my claims in this case, litigation strategy, potential witnesses, updates on how the case was proceeding, and how I could help the case. For example, I remained in regular communication with my attorneys regarding mediation discovery and settlement discussions that the parties had during the course of litigation and mediation. I also provided information and documents to my attorneys to assist them in preparing the case. I also spent time reviewing and discussing the Settlement Agreement as well as other documents from my attorneys, and reviewing my own records for documents that would be potentially relevant to the case.

5. When I filed this lawsuit, I understood that this lawsuit could benefit my former co-workers, other Defendant’s employees, and the State of California by helping to recover civil penalties on their behalf as a result of the alleged violations described above. I also understood that I was filing this case as an “aggrieved employee” on behalf of myself and my fellow “aggrieved employees” as well as

the State of California. I do not believe that I have any conflicts with Aggrieved Employees included in this proposed Settlement.

6. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to search for information online these days, I understood I would face an increased risk that future employers would discover information about this lawsuit online and had a negative reaction to learning that I sued an employer. This may make it harder for me to obtain future employment or change jobs for a better opportunity.

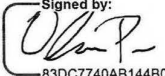
7. I believe that the Settlement obtained on behalf of the aggrieved employees and the State of California is fair and reasonable in view of the issues and risks involved with the case.

8. I believe that Service Award of \$10,000 for me for representing other aggrieved employees and for general release of all claims is fair and reasonable. This enhancement takes into consideration the time, effort, risks, stress, and sacrifice of signing a general release of all claims beyond PAGA claims released by other employees, as well as the benefit provided to aggrieved employees as a result of my involvement in this litigation.

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

Executed 1/21/2026 | 9:25 AM PST

, at Torrance, California.

Signed by:


83DC7740AB144B0...

OLIVIA PASS

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)

) ss

3 COUNTY OF LOS ANGELES)

4 I am employed in the county of Los Angeles, State of California. I am over the age of 18
5 and not a party to the within action; my business address is 707 Wilshire, Blvd., Suite 4700
6 Los Angeles, California 90017

7 On the date indicated below, I served the document described as: **DECLARATION OF**
8 **OLIVIA PASS IN SUPPORT OF PLAINTIFF'S MOTION FOR AN ORDER**
9 **APPROVING SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE**
10 **PRIVATE ATTORNEY GENERAL'S ACT OF 2004** on the interested parties in this action
11 by sending a true copy
12 thereof to interested parties as follows and as stated on the attached service list:

13 Summer Young-Agriesti
14 syounag@kbylaw.com

15 Ana Thomas
16 athomas@kbylaw.com

17 Melissa Brandman
18 mbrandman@kbylaw.com

19 Andrew Cristea
20 acristea@yatlaw.com

21 Michelle Perciavalle
22 mperciavalle@kbylaw.com

23 **Young-Agriesti & Thomas, LLP**
24 7755 Center Avenue, Suite 1100
25 Huntington Beach, California 92647
26 Telephone: 949-221-8700
27 Facsimile: 949-222-1044

28 *Attorneys for Defendant DEL AMO HOSPITAL, INC.*

[✓] **BY E-MAIL:** I hereby certify that this document was served from Glendale, California,
by e-mail delivery on the parties listed herein at their most recent known e-mail address or
e-mail of record in this action.

[✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept electronic
service, I caused the documents to be sent to the persons at the electronic service addresses
listed above via electronic mail. I did not receive an error message.

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

Executed on March 9, 2026, at Los Angeles, California.

Ivette Hernandez

Name


Signature

PROOF OF SERVICE