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**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

Honorable William E. Weinberger
Department 371

**DECLARATION OF HADIZA JIMADA IN
SUPPORT OF PLAINTIFFS' MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF CLAIMS BROUGHT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT OF 2004**

Reservation ID: 476005153224
Date: May 26, 2026
Time: 8:30 a.m.
Department: 37

Complaint Filed: February 5, 2024
FAC Filed: April 11, 2025
SAC Filed: February 11, 2026
Trial Date: None Set

DECLARATION OF HADIZA JIMADA

I, Hadiza Jimada, 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 case and the named plaintiff in the related action entitled *Hadiza Jimada v. UHS of Delaware, Inc. et al.*, Los Angeles Superior Court case number 24TRCV0128 (collectively "the Actions"). 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 Defendants Del Amo Hospital, Inc., UHS of Delaware, Inc., Del Amo Behavioral Health System, and Del Amo Behavioral Health System of California (together, "Defendants") from approximately March 2021 to approximately November 2023. I decided to seek legal advice about my work experiences with Defendants 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 Defendants were 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, representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and, if I were approved as a representative, what my duties and responsibilities would be.

3. Throughout the Actions, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid, non-exempt employees, filing a declaration in opposition to Defendants' motion to compel my claims to arbitration, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their

1 staff to make sure that they had all of my most current information and any additional
2 information that I had obtained.

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

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

13 6. I believe that I have done everything that my attorneys have asked of me and have
14 tried, to the best of my ability, to represent and pursue relief on behalf of the State of California
15 with respect to aggrieved employees. I think my efforts helped to get the result obtained in the
16 Actions, and as a PAGA representative, I respectfully request that the Court award me an
17 enhancement award for my efforts in pursuing and participating in the Actions, as well as my
18 broader release of claims. Taking into consideration the time that I have dedicated to the Actions,
19 I believe that this amount is reasonable.

20 7. As a term of the Settlement Agreement, I am providing a broader individual
21 waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in
22 Section 5.1.2 of the Settlement Agreement).

23 8. The Settlement provides for an Enhancement Award to me in the amount of
24 \$10,000.00, to be paid out of the Gross Settlement Amount, subject to Court approval. I
25 respectfully request that the Court award me full payment of the Enhancement Award.

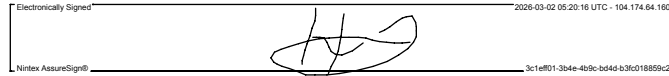
26 9. I am not related to anyone associated with Lawyers *for* Justice, PC; Tunyan Law,
27 APC; or The Sentinel Firm, APC.

28 10. I have not entered into any undisclosed agreements, nor have I received any
undisclosed compensation in this matter. The only compensation I will receive is whatever

1 amount the Court awards as an Enhancement Award, as well as my share of the settlement as
2 an aggrieved employee.

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

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6 Executed on 02/26/2026, at Hawthorne, California.

7
8 The signature block contains a handwritten signature in blue ink. Above the signature, it says "Electronically Signed" and "2026-03-02 05:20:16 UTC - 104.174.64.160". Below the signature, it says "Nintex AssureSign" and "3c1ef01-3b4e-4b9c-bd4d-b3fc018859c2".

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Hadiza Jimada

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action; my business address is 355 S. Grand Ave., Suite 1450
7 Los Angeles, CA 90071.

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

13 Summer Young-Agriesti
14 syoung@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 8, 2026, at Los Angeles, California.

Ivette Hernandez

Name

Signature