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

ANNIE ALBRITTON, individually, and on
behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

ALLIED PROFESSIONAL NURSING
CARE, INC., a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: CIVSB2124648

Honorable Christian Towns
Department S26

CLASS ACTION

**DECLARATION OF ANNIE
ALBRITTON IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, ATTORNEYS'
FEES, LITIGATION COSTS, AND
ENHANCEMENT PAYMENT**

Date: January 6, 2024
Time: 8:30 a.m.
Department: S26

Complaint Filed: August 26, 2021
FAC Filed: May 29, 2024
Trial Date: None Set

DECLARATION OF ANNIE ALBRITTON

I, **ANNIE ALBRITTON**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. 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 Allied Professional Nursing Care, Inc. (“Allied Professional Nursing Care”) as an hourly-paid Licensed Vocational Nurse during the Class Period. I decided to seek legal advice about my work experience with Allied Professional Nursing Care. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Allied Professional Nursing Care paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **1 hour**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **6 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **9 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included gathering documents concerning my employment with Allied Professional Nursing Care, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly-paid employees and helping develop a strategy as to what documents and information to obtain from Allied Professional Nursing Care. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as

possible and gave them as much information and identified as many documents as I could. I spent at least **7 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Allied Professional Nursing Care.

5. As far as the settlement is concerned, I spent about **1 hour** reviewing the settlement agreement and about **1 hour** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me an enhancement award in the amount of \$10,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement as a class member and as an aggrieved employee.

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

Executed on this day 07/08/2024, at Apple Valley, California.

Electronically Signed: 2024-07-08 18:24:17 UTC - 137.25.196.153
Nintex AssureSign® 09e76277-e44f-45d5-b737-b1a201736ca4

Annie Albritton