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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

JIM HETZLER and LYNNORA VASQUEZ, individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

CANYON RIDGE HOSPITAL, INC., a California corporation; and DOES 1 through 50,

Defendants.

Case No.: CIVSB2412550

Assigned for all purposes to the Honorable Thomas S. Garza, Dept. S27

DECLARATION OF LYNNORA VASQUEZ IN SUPPORT OF PLAINTIFFS' MOTION FOR APPROVAL OF PAGA SETTLEMENT, ATTORNEY'S FEES AND COSTS, AND REPRESENTATIVE ENHANCEMENT PAYMENTS

Date: June 3, 2027
Time: 8:30 a.m.
Dept.: S27

Complaint Filed: April 11, 2024
FAC Filed: May 22, 2024
SAC Filed: September 22, 2026
Trial Date: Not Set

DECLARATION OF LYNNORA VASQUEZ

I, Lynnora Vasquez, declare as follows:

1. I am over 18 years of age. I am a named plaintiff in the action entitled *Jim Hetzler and Lynnora Vaquez v. Canyon Ridge Hospital, Inc.*, San Bernardino County Superior Court Case No. CIVSB2412550 (the "*Hetzler* Action"). I have personal knowledge of the facts stated herein and if called as a witness I could and would competently testify thereto.

2. I make this declaration in support of Plaintiffs' Motion for Approval of PAGA Settlement.

3. I am a former employee of Defendant Canyon Ridge Hospital, Inc. ("Defendant"). I was employed by Defendant as an hourly-paid, non-exempt charge nurse from approximately May 2021 to July 2026.

4. During my employment with Defendant, I reached out to my attorneys at Parker & Minne, LLP to discuss my employment with Defendant and the ways I believed I had been undercompensated during my employment. I wanted to take steps to make sure that Defendant was held accountable for not paying its employees properly. I spent several hours discussing my experiences working for Defendant with the attorneys at Parker & Minne, LLP, as well as representative actions under the Labor Code Private Attorney Generals Act. I also had extensive discussions with my attorneys about what it meant to be a named plaintiff and PAGA representative, and the duties and risks associated with that role. After speaking with my attorneys, I agreed to serve as a representative PAGA plaintiff on behalf of the State of California and other Aggrieved Employees in the action entitled *Lynnora Vaquez v. Canyon Ridge Hospital, Inc.*, San Bernardino County Superior Court Case No. CIVSB2420772 (the "*Vasquez* Action"). On September 22, 2026, a Second Amended Complaint adding myself and my claims from the *Vasquez* Action to the *Hetzler* Action was filed for purposes of settlement approval as an agreement to globally resolve the *Hetzler* Action and the *Vasquez* Action had been reached.[1]

[1] The *Hetzler* Action and the *Vasquez* Action are collectively referred to herein as the "Actions".

5. Throughout the course of the Actions, I have spent a significant amount of time meeting with my attorneys regarding the Actions and working to achieve the best possible outcome for the State of California and the Aggrieved Employees. Specifically, as of the date of this declaration, I estimate that I have devoted over 30 hours of my time on the Actions, including but not limited to, the following tasks: (a) initial consultations with Parker & Minne, LLP regarding my potential claims against Defendant and representative PAGA actions; (b) conducting my own independent research regarding PAGA lawsuits and employment law firms; (c) participating in numerous lengthy meetings, telephone calls and other communications with my attorneys throughout the course of the litigation regarding Defendant's policies, practices, procedures, and operational structure, Aggrieved Employees' job duties, and my own personal experiences working for Defendant; (d) gathering documents pertaining to my employment with Defendant at the request of my attorneys; (e) reviewing documents with my attorneys and answering their questions; (f) helping my attorneys develop a strategy regarding the documents and information needed to establish the claims alleged in the Actions; (g) providing information regarding potential witnesses to my attorneys; (h) regularly checking in with my attorneys to monitor the status of the Actions; (i) making myself available throughout the day of the mediation and providing my attorneys with additional information during the mediation; (j) reviewing the Agreement and extensively discussing its terms with my attorneys; and (k) reviewing and discussing this declaration in support of the Motion for Approval of PAGA Settlement with my attorneys.

6. Throughout the course of the Actions, I have made sure that I understood everything that was going on in the cases so I could make the best decisions on behalf of the Aggrieved Employees and State of California. I have routinely checked in with my attorneys to monitor the status of the Actions. I also promptly responded to several additional phone calls with my attorneys throughout the Actions and provided additional information needed for the Actions, including several extensive discussions prior to mediation. I kept in contact with my attorneys throughout the mediation and provided additional information when my attorneys reached out to me during the mediation. After the Parties accepted the mediator's proposal in this matter, I

continued to contact my attorneys on a regular basis for updates on their efforts to finalize the Settlement Agreement and the Motion for Approval of PAGA Settlement. I will continue to actively participate in the Actions and monitor the Settlement until it is finalized.

7. When the Actions settled, I reviewed the Settlement and discussed its terms with my attorneys. I recognize and accept that any resolution of the Actions are subject to court approval. I believe the Settlement is fair and reasonable in light of the issues presented by the Actions.

8. I am not aware of any interests that I have that are contrary to the interests of the Aggrieved Employees and State of California, and I do not know of any conflicts of interest that would keep me from adequately representing the Aggrieved Employees and State of California.

9. I fully realized the risks I would be taking by pursuing the Actions as a named plaintiff and PAGA representative. I knew that future employers might conduct a background check on me or otherwise find out about my participation in the lawsuit, and that serving as a PAGA representative could affect my employment opportunities and my ability to secure a job in the future. I also knew that there was no certainty as to the ultimate outcome of the Actions, and that if Defendant was to prevail in the Actions there was a possibility I could have been liable for Defendant's litigation costs. Despite these risks, I felt so strongly about standing up for the rights of Defendant's employees that I initiated and participated fully in this lawsuit.

10. I believe that I have done everything that my attorneys have asked of me and have tried. I think my efforts helped get the result obtained in the Actions. Accordingly, I respectfully request that the Court award me the Representative Enhancement Payment in the amount of $5,000.00 in recognition of the benefit I helped obtain for the State of California and other Aggrieved Employees and for my active participation in the Actions. I believe that this amount is fair and reasonable in light of the time I have spent on the Actions and the risk I assumed in acting as a PAGA representative.

11. I am not related to anyone associated with Parker & Minne, LLP or Justice for Workers, P.C.

12. I do not have any relationship with or financial interest in the proposed Settlement Administrator, Phoenix Settlement Administrators.

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

Executed on 10/12/2026.

LYNNORA VASQUEZ (Oct 12, 2026 13:24:48 PDT)

Lynnora Vasquez