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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:
Hon. Thomas S. Garza, Dept. S27]

DECLARATION OF JIM HETZLER IN SUPPORT OF MOTION FOR APPROVAL OF PAGA SETTELEMENT, ATTORNEY'S FEES AND COSTS, AND REPRESENTATIVE ENHANCEMENT PAYMENTS

(Filed Concurrently with Notice of Motion and Motion for Approval of PAGA Settlement; Supporting Declarations and [Proposed] Judgment and Order)

DATE: June 3, 2027
TIME: 8:30 a.m.
DEPT: S27

Action Filed: April 11, 2024
Trial Date: Not Set

I, Jim Hetzler, hereby declare as follows:

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

2. I was employed by Defendant Canyon Ridge Hospital, Inc. ("Defendant") as an hourly-paid, non-exempt employee for over 20 years through approximately January 2024 in the position of mental health worker. During my employment with Defendant, I was subject to Defendant's wage and hour policies and practices that are at issue in this case.

3. During my employment with Defendant, I was subjected to Defendant's policies, procedures, and practices at issue in this case. I sometimes worked off the clock during my meal breaks, did not receive compliant meal and rest periods because of understaffing, and afterhours and during weekends without compensation. As a result of these issues, I believe I was not paid all wages upon termination of employment and I did not receive accurate wage statements.

4. I have been actively involved in this case since I first retained Justice for Workers, P.C. ("JFW"). Without waiving the attorney-client privilege, prior to filing this lawsuit, my attorneys explained my role and responsibilities as a PAGA representative, and I understand my responsibilities as a PAGA representative. Since retaining my attorneys, I have had many discussions with the attorneys and staff at JFW regarding Defendant's wage and hour practices and my claims in this case, updates on how the case was proceeding, the settlement, and how I could help the case and other employees of Defendant. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant documents with my attorneys.

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

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settlement to assure that it is fair.

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

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

Executed on August 19, 2026 at San Bernardino, California.



Jim Hetzler

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