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Attorneys for Plaintiff
 Karina Zayas

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JESLYN BARRIOS, and KARINA ZAYAS,
 individually, and on behalf of the State of
 California and other aggrieved persons,

Plaintiffs,

v.

TRI-STATE COMMUNITY HEALTHCARE
 CENTER, a California corporation; and DOES 1
 through 50, inclusive,

Defendants.

Case No.: 24STCV28332

*[Assigned for All Purposes to the Hon.
 Samantha Jessner, Dept. 7]*

**DECLARATION OF KARINA ZAYAS IN
 SUPPORT OF PLAINTIFFS' MOTION
 FOR FINAL APPROVAL OF CLASS
 ACTION AND PAGA SETTLEMENT**

Final Approval Hearing:

Date: June 11, 2026

Time: 10:00 a.m.

Dept: 7

Action Filed: October 29, 2024

DECLARATION OF KARINA ZAYAS

I, Karina Zayas, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Final Approval of Class Action and PAGA Settlement.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

2. When I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendant Tri-State Community Healthcare Center (“Tri-State Community Healthcare Center”) and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Tri-State Community Healthcare Center, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner’s office.

3. I was also made aware that being a class representative and private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a class representative and private attorney general, I might be responsible for some or all of Tri-State Community Healthcare Center’s legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

4. I understood that there were risks involved in class and representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

5. As a named plaintiff, I am the face of the litigation. The class notice was mailed to approximately 437 current and former employees of Tri-State Community Healthcare Center, which informed them that I filed a lawsuit against Tri-State Community Healthcare Center. Exposing

1 myself to this kind of publicity creates a risk for my future career prospects, since current and former
2 employees of Tri-State Community Healthcare Center may move to different companies within the
3 industry or may know people at other companies within the industry who may not wish to hire
4 someone who sued her employer. I also understand that having filed this lawsuit in court means that
5 there is now a permanent public record of this lawsuit available to the general public. Given this
6 additional exposure, there is further risk to my future career prospects.

7 **Amount of Time and Effort Spent and Duration of the Litigation**

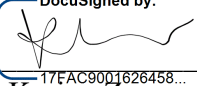
8 6. I have spent a substantial amount of time and effort on this litigation. My work on
9 this case has included, among other things, searching for documents related to my employment with
10 Tri-State Community Healthcare Center, discussing my experiences working for Tri-State
11 Community Healthcare Center, keeping in regular contact with my attorneys regarding the status of
12 the case, helping my attorneys prepare for mediation, being on-call for my attorneys on the day of
13 mediation in case questions or concerns arose during mediation, and participating in settlement
14 discussions. After mediation, I remained actively involved by reviewing the settlement papers and
15 contacting my counsel for updates. I estimate that since I retained my counsel in January 2024, I
16 have spent approximately 35 hours on the activities described above. And I estimate that I will spend
17 an additional 1-5 hours assisting my attorneys through the approval process and staying up to date
18 with the case through disbursement of the settlement checks.

19 **Personal Benefit Received as a Result of the Litigation**

20 7. Absent the requested service payment, the personal benefit I will receive from this
21 settlement is the same as all other employees.

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

24 Executed on 5/7/2026, at Hemet, California.
(City Name)

25 DocuSigned by:
26 
27 17FAC9001626458...
28 Karina Zayas