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Attorneys for Plaintiff Kristian Dodson, on behalf of herself and other aggrieved employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

KRISTIAN DODSON, on behalf of herself and other aggrieved employees,

Plaintiff,

vs.

LA MIRADA POST ACUTE LLC, a California Limited Liability Company; SUN MAR REHABILITATION SERVICES, LLC, a California Limited Liability Company; SUN MAR MANAGEMENT SERVICES, a California Corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No. 24STCV11019
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Richard L. Fruin
Department 307

REPRESENTATIVE ACTION

DECLARATION OF KRISTIAN DODSON IN SUPPORT OF MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT ("PAGA") SETTLEMENT

Date: November 17, 2026
Time: 9:15 a.m.
Dept: 307
Judge: Hon. Richard L. Fruin
Reservation: 014615751961

Complaint filed: May 1, 2024
Trial date: Not Set

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I, Kristian Dodson, declare as follows:

1. I am the named Plaintiff in this case. This Declaration is based on my personal knowledge and if called to testify I could competently testify to the matters stated.

2. Since filing this case against La Mirada over two years ago, nearly every month I've had some aspect of it pop up in my mind, maybe only for a couple seconds, or even just for a few minutes on days where I was not actively working on something my attorneys requested. I worked extremely hard representing the State and a group of employees, doing all that was asked of me by my attorneys. It is difficult to estimate the total time I dedicated to the case over the past several years, but I believe it is approximately 55 total hours, which is only about 2 hours a month or 25 hours a year.

3. I worked as an LVN Charge Nurse for La Mirada in Sunny Hills from August 2023 through December 2023.

4. I am not related to anyone associated with Hekmat Law Group or Cohelan Khoury & Singer. I am unaware of any interests I have adverse to other Aggrieved Employees.

5. I understood a lot of work would be required of me in this case. I was willing to, and did, have many calls and emails with my attorneys, asking about the progress of the case, the meaning of the developments, and responding to all questions they had about my employment.

6. For example, my attorneys had many questions about working conditions at La Mirada, Company policies, and patient care demands. They asked me to review many documents related to my assignments and Company policies. I explained them and identified other documents to request.

7. I understood by representing a group of employees and the State, and not just myself, the case would take much longer, and that I might not receive as much, and would not have a chance for a fast or private settlement, without filing a lawsuit.

8. I understood by filing this lawsuit against an employer I risked losing future employment opportunities. I believe the Defendants' collectively own or manage fourteen skilled nursing facilities in California. Aside from potentially losing those opportunities, any

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prospective employer can do a simple internet search and see I sued a past employer. When googling my name, this lawsuit appears as one of the first results.

9. Despite these factors, I decided I would rather pursue a lawsuit with the potential to address issues in addition to my own on behalf of others.

10. I provided information to my attorneys, and their staff, used to file claims with the State of California, which I understood was required before filing claims in court. I provided additional information and responded to requests from my attorneys as they drafted the lawsuit and I reviewed the lawsuit before it was filed.

11. I believe my thorough knowledge of La Mirada's practices helped my attorneys to evaluate the claims and prepare for mediation. I consulted with my attorneys before mediation, made myself available the day of mediation to answer any questions my attorneys or the mediator had, and spoke with my attorneys as negotiations continued.

12. I reviewed and asked questions about the terms of the settlement, and after talking with my attorneys, signed the Settlement Agreement.

13. Based on my attorneys' evaluation, my knowledge of the issues in case, and the risks involved in continuing, I believe the proposed settlement is an excellent result.

14. As the sole plaintiff in this case for several years, I took my duties and responsibilities seriously, worked with my attorneys, and did all that was asked of me.

15. I understand, unlike any other employees, I am waiving any and all claims against La Mirada, known and unknown, in order to settle this case. Whether because of the complete release I must give, the many hours and years I devoted to the case, or the risks I accepted by bringing it, I request, and believe it is reasonable to receive, a service payment or individual settlement of $10,000 provided in the settlement agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 28, 2026 at Artesia, California.

DocuSigned by:
Kristian Dodson
0B52C6BE5475421

Kristian Dodson

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