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7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF KERN**

10 BABATUNDE ADESANYA and RACHEL
SANCHEZ, on behalf of themselves and
11 others similarly situated,

12 Plaintiffs,

13 vs.

14 SAN JOAQUIN COMMUNITY HOSPITAL,
dba ADVENTIST HEALTH BAKERSFIELD,
15 a California nonprofit corporation;
ADVENTIST HEALTH, an entity of unknown
16 form; and DOES 1 through 50, inclusive,

17 Defendants.
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Case No. BCV-24-102762

Assigned for All Purposes To:
Hon. Thomas S. Clark
Dept.: 17

**DECLARATION OF PLAINTIFF
BABATUNDE ADESANYA IN SUPPORT
OF PLAINTIFFS' MOTION TO
APPROVE OF SETTLEMENT OF
PRIVATE ATTORNEYS GENERAL ACT
CLAIMS, AND ENTERING JUDGMENT
THEREON**

Date: March 20, 2026
Time: 8:30 a.m.
Dept.: 17

DECLARATION OF BABATUNDE ADESANYA

I, BABATUNDE ADESANYA, declare as follows:

1. I am over the age of eighteen. I submit this Declaration in support of the concurrently filed Motion for Approval of the PAGA Settlement. The following is based upon my personal knowledge, and if called as a witness, I could and would competently testify regarding the statements in this Declaration.

2. I was employed by Defendant San Joaquin Community Hospital ("Defendant"), from approximately April 2021 to August 2023 as a non-exempt employee with the title of Certified Nursing Assistant. My duties included but were not limited to taking care of patients, cleaning, and assisting with food.

3. Prior to filing this lawsuit, I searched for an attorney and found D.Law, Inc. I never knew D.Law, Inc. before my consultation with them. After my consultation, I asked them to represent me in bringing a class and PAGA action on behalf of myself and all other similarly situated non-exempt employees of Defendant.

4. I knew the alleged Labor Code violations complained of in the complaint not only happened to me but happened to the other employees of Defendant that I worked with. I wanted to help the other non-exempt workers vindicate their rights, so I decided to bring this action that we filed on or about August 15, 2024.

5. I believe my situation is similar and has been similar to all other non-exempt employees like me who worked for Defendant during the PAGA period. The Complaint which I brought against Defendant, alleged PAGA Representative claims for: (a) failing to pay wages including overtime, (b) failure to provide meal periods for every work period exceeding more than five (5) and ten (10) hours per day and failure to pay an additional hour's of pay or accurately pay an additional hour's of pay in lieu of providing a meal period; (c) failure to provide rest breaks for every four hours or major fraction thereof worked and failure to pay an additional hour's of pay or accurately pay an additional hour's of pay in lieu of providing a rest period; (d) failing to provide accurate itemized wage statement; (e) failure to provide payroll records; and (f) failure to pay wages at separation.

1 6. I believe that my interests have been and continue to be in alignment with the
2 Aggrieved Employees, and I am willing to continue to pursue and prosecute their representative
3 claims against Defendant in this litigation. I believe I do not have any interests which are against
4 the interests of the Aggrieved Employees, and I will continue to do what is best for all the
5 Aggrieved Employees rather than myself, as I have done from the beginning of this case.

6 7. My relationship with D.Law, Inc. is purely an attorney client relationship and there
7 are no other business, familial or social relationships between my attorney and myself. In
8 addition, I do not have any relationship with Defendant other than being a former employee of
9 Defendant. For these reasons, there is no conflict of interest between myself, my attorney,
10 between Defendant, and myself or between the Aggrieved Employees and myself.

11 8. As one of the PAGA Representatives in this case, I participated in every aspect of
12 the litigation and have been apprised of its progress. I believe I have maintained the best interests
13 of the Aggrieved Employees while performing my PAGA Representative duties, and I
14 participated in many interviews and conferences with PAGA counsel regarding the conduct and
15 settlement of this matter. I have spoken with several other Aggrieved Employees and provided
16 information regarding their claims to my counsel in support of proving the PAGA claims and
17 establishing what happened to us as a group of employees.

18 9. My counsel has informed me that this information, along with the details and
19 support I provided for the claims alleged in this matter, were very important in convincing
20 Defendant to negotiate the settlement now before the Court for approval. I have also provided
21 many documents to my counsel in support of the PAGA claims, have helped my attorneys with
22 preparing written questions and what documents to ask for, and I have invested a lot of time and
23 effort in performing my duties on behalf of the Aggrieved Employees. I also conducted
24 numerous meetings with my counsel to prepare for and discuss Defendant' information requests
25 in advance of the mediation.

26 10. After reviewing the settlement agreement and speaking with my counsel about it,
27 I agreed to sign it on behalf of myself and all the other Aggrieved Employees. I signed the
28 settlement because I believe the Settlement obtained in this case on behalf of the Aggrieved

1 Employees is very fair, sufficient, and reasonable in view of the facts I know and have been made
2 aware of, and due to the risk of going through further litigation. I believe the average payouts for
3 the Aggrieved Employees are very reasonable considering all the facts and evidence and risks
4 moving the case forward to trial.

5 11. I also understand and believe to be fair the settlement allocation formula and
6 believe it fairly accounts for the individual settlement payments based on the strengths and
7 weaknesses of the various alleged claims and also considering the individual compensation and
8 pay rates for the various PAGA members over the settlement period.

9 12. I understood and accepted the risk of being a PAGA Representative in a PAGA
10 action under the Labor Code may affect my future ability to get other jobs in this industry. I also
11 understood and accepted the risk of potentially being liable for the opposing parties' costs and
12 attorneys' fees if I was unsuccessful in this lawsuit. I voluntarily assumed these real and large
13 risks and the case would not have been brought without me and the other PAGA members. I
14 believe the Aggrieved Employees will receive a good benefit by resolving their claims against
15 Defendant under the terms of the settlement.

16 13. I declare under penalty of perjury under the laws of California that the foregoing is
17 true and correct. Executed on this 13th day of February 2026 at Bakersfield, California.

Signed by:

Babatunde Adesanya

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BABATUNDE ADESANYA