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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF MONTEREY**

CHRISTIE MINES, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

SOUTHERN MONTEREY COUNTY  
MEMORIAL HOSPITAL, a California  
nonprofit corporation; and DOES 1  
through 50, inclusive,

Defendants.

Case No.: 24CV005289

Assigned to the Honorable Thoman W. Wills, Dept.  
15)

**DECLARATION OF CHRISTIE MINES IN  
SUPPORT OF PLAINTIFF’S MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

Date: November 21, 2025

Time: 8:30 A.M.

Dept.: 15

Action Filed: December 12, 2024

Trial Date: Not Set

**DECLARATION OF CHRISTIE MINES**

I, Christie Mines, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Defendant Southern Monterey County Memorial Hospital (“Defendant”) as a Clinical Laboratory Scientist from about February 20, 2024, until about November 19, 2024. During my employment, I worked as a non-exempt, hourly employee.

3. Throughout my employment, I regularly earned non-discretionary remuneration, including shift differential pay. During pay periods when I was paid non-discretionary remuneration and earned overtime and/or double time wages, the overtime wages were not paid at the correct rate of pay. Instead of paying 1.5 times the regular rate of pay, Defendant paid overtime at 1.5 times the base rate of pay. As such, I did not receive all wages owed to me.

4. I have yet to receive the underpaid overtime wages. As such, I believe I am owed waiting time penalties.

5. Also, given the underpayment of wages, I believe that Defendant did not provide me with accurate wage statements because the wage statements did not provide all of the information regarding the underpayments.

6. I understand that this action was brought on behalf of all other non-exempt employees who suffered similar alleged harms in the State of California, and I am acting as a representative for the Settlement Class. As Class Representative, I understand that it is my responsibility to act in the best interest of the Settlement Class and not my own. I agree that I will not put my own interests ahead of that of the Settlement Class, and that I will not settle my claims separately or independently from the Settlement Class. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the Settlement Class that would impair or affect my ability to serve as representative for the Settlement Class.

7. I have and continue to be willing to assist in the investigation of this matter, including providing any necessary information and documents, as well as make myself available

for trial or any further proceedings in this matter as required to represent the interests of the Settlement Class. I also understand my duties and responsibilities to the proposed class and will carry out those duties as necessary.

8. I have also agreed to provide a general release of claims in conjunction with this settlement. I understand this is a more comprehensive release than provided by the Class Members themselves.

9. I have discussed the terms of the settlement with my attorneys, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Settlement Class.

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

Executed on this 10/21/2025 day of October 2025, at Berkeley, California.

DocuSigned by:  
  
 Christie Mines