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of herself and all others similarly situated

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MAYBELYN UGALE on behalf of herself
and all others similarly situated,,

Plaintiff,

vs.

STANFORD HEALTH CARE, a California
corporation; THE HOSPITAL COMMITTEE
for the LIVERMORE-PLEASANTON
AREAS d/b/a STANFORD HEALTH CARE-
VALLEYCARE, a California corporation and
DOES 1 through 50, inclusive,

Defendants.

Case No. RG21092943

Consolidated with 23CV040727 (Lead Case
RG21092943)

ASSIGNED FOR ALL PURPOSES TO:
Judge: Hon. Patrick McKinney, Dept.: 18

**DECLARATION OF MAYBELYN
UGALE IN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

DECLARATION OF MAYBELYN UGALE

I, Maybelyn Ugale, declare as follows:

1. I am a Named Plaintiff in the case of *Maybelyn Ugale v. Stanford Health Care et al.* (Alameda County Case No. RG21092943). I make this declaration on the basis of my personal knowledge and if asked to testify thereto I could and would do so.

2. I was employed by Defendant (“Standford Health” or “Defendant”) at the Stanford Health Care – ValleyCare facility located in Pleasanton, California from on or about September 11, 2000, until on or about May 27, 2020. During my employment, I occupied a non-exempt hourly position in housekeeping.

3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances that I had against Stanford Healthcare, I was made aware of the advantages and disadvantages of litigation. I was also made aware of my responsibilities as both a Plaintiff and a class and PAGA representative prior to filing the class action complaint which was filed on or about March 19, 2021. I accepted the responsibility and agreed to move forward. I pledged to participate actively in the lawsuit.

4. During the litigation of this case, I have continuously interacted with my attorneys to discuss the status of the case. I provided relevant oral and documentary information necessary to prosecute this case. By way of example, I searched for and provided relevant documents pertaining to my work with Defendant and engaged in multiple discussions with my attorneys regarding my work experiences with Defendant. These discussions include, but are not limited to, the following topics: the policies, practices and specific working conditions under Defendant. I have also had numerous discussions with my attorneys regarding the progress of this case and in preparation for the mediation. I also made myself available as needed during the mediation. I have spent approximately 45 to 55 hours assisting my attorneys in their litigation of this case.

5. By agreeing to bring this action, I formally accepted the responsibilities of representing the interests of all similarly situated employees in California and willingly chose to assume the risks and potential costs that I alone might have to bear if judgement had been

rendered in favor of Defendant.

6. As part of the settlement agreement, I also signed a general release, including a California Code of Civil Procedure 1542 release, releasing all claims I have or may have against Stanford Health, which is far broader than the release by class members. The class representative service payment also serves as compensation for agreeing to this full, general release of all claims against Stanford Health.

7. I also risked the potential stigma of being a named plaintiff in a representative action labor dispute which could affect my further employability in the industry or with any prospective employer who learns of my lawsuit against a former employer.

8. The class representative service payment requested, subject to court approval, is Ten Thousand Dollars (\$10,000). I believe that this amount is fair and reasonable in light of the risks undertaken (both personal and financial) in litigating this matter as a class action and PAGA representative, as well as the time and effort I have expended in doing so, which have resulted in a favorable outcome to the class members and aggrieved employees.

9. I have not directly experienced negative affect(s) in relation to any further employment opportunities because of this lawsuit. However, I did risk negative effects on my employability when I formally accepted the responsibilities of a class representative and willingly chose to assume significant risks and potential costs that I alone might have had to bear if judgement would have been rendered in favor of Defendant.

10. I am not aware of any conflicts between me and the other Plaintiff and the putative class members in this action.

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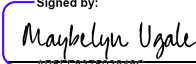
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11. I am aware of an agreement between my counsel and counsel in a related case, *Brittney Swoopes v. Stanford Health Care Tri-Valley*, Case Alameda Superior Court, Case No. 23CV040727 to work together in prosecuting my action and the related action. I am also aware they have agreed to share any attorney's fees awarded in this matter. I am in agreement with this cooperation.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on 11/14, 2025, at Tracy, California.

Signed by:

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 Maybelyn Ugale