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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 FOR THE COUNTY OF SAN DIEGO**

STEPHANIE JONES, an individual, on  
 behalf of herself and on behalf of all persons  
 similarly situated,

Plaintiff,

vs.

RADY CHILDREN'S HOSPITAL-SAN  
 DIEGO, a Corporation; and DOES 1 through  
 50, inclusive,

Defendants.

[AND CONSOLIDATED MATTERS]

CASE NO.: **37-2023-00027035-CU-OE-CTL**

[Consolidated with:  
 37-2023-00041000-CU-OE-CTL and  
 37-2024-00018852-CU-OE-CTL]

**DECLARATION OF KRISTIN DIANE  
 FLEISCHMAN IN SUPPORT OF  
 PLAINTIFFS' MOTION FOR  
 PRELIMINARY APPROVAL OF CLASS  
 ACTION SETTLEMENT**

Hearing Date: April 25, 2025

Hearing Time: 1:30 p.m.

Judge: Hon. Katherine Bacal

Dept.: 63

Date Action Filed: March 27, 2024

Trial Date: Not set

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**DECLARATION OF KRISTIN DIANE FLEISCHMAN**

I, KRISTIN DIANE FLEISCHMAN hereby declare as follows:

1. I am over the age of eighteen. The following is based upon my personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendant Rady's Children's Hospital, ("Defendant" or "Rady's") in approximately August 2013 as a Non-Exempt Employee working as a Clinical Laboratory Scientist. I am still currently employed by Defendant. While working for Rady, I do not think I was paid for all of my work time, such as time spent working off-the-clock. I also do not think I got all of my meal and rest breaks like I was supposed to. I also had to purchase supplies but never got any reimbursement.

3. I decided to bring this lawsuit because I did not feel that I was treated fairly as an employee of Defendant, especially with regard to not being paid properly for all the hours I worked, and not getting all of my proper lunches and rest breaks. As a result, I believe the other class members and myself are owed additional compensation for all of the work we did that was not paid for by Rady.

4. It is my understanding this lawsuit could not have been prosecuted or settled unless I or some other employee decided to serve as a named plaintiff and pursue the case. In deciding to serve as a named plaintiff, I understood that my name would be publicly attached to this lawsuit and that my work experiences to some extent would be set forth in a public court file. I recognized that I would need to devote a certain amount of time that I could have spent otherwise. I also recognized that my bringing the lawsuit carried some degree of risk. Despite this, I decided to serve as the named plaintiff without any promise of recovery or compensation.

5. I am familiar with the work involved in prosecuting this case. I have participated in numerous meetings and communications with my lawyers regarding this case. I am familiar with the allegations and defenses of the claims in this case. I am familiar with the major events in this case, including the investigation performed by my lawyers, the mediation with Defendant that resulted in this settlement, and the preparation of settlement papers and the need to obtain court approval of the proposed settlement. I also prepared for my deposition, although it was

never taken as a result of the settlement, and I participated in all stages of the litigation and provided my lawyers with information and documents regarding my employment with Defendant.

6. I believe that the proposed settlement obtained on behalf of the class and aggrieved employees is excellent in view of the issues and risks involved with the case.

7. I believe I have fulfilled my duties as a named plaintiff and class representative, which required a significant amount of time and effort during the course of this case. These efforts required dedicating numerous hours to lawsuit activities including, but not limited to: (a) communicating with my attorneys to stay informed of ongoing developments in the case and to discuss the proposed settlement ultimately negotiated; (b) searching for and providing documents and other materials relating to my work experience; (c) responding to requests for information relating to my work experience; (d) preparing for my deposition although it was never taken as result of the settlement, and (e) reviewing filings and key documents including drafts of the complaint and the settlement agreement. These tasks required my dedication of at least 30-35 or more hours of my time, which time I honestly could have spent on family, personal time, or work. My understanding is that future tasks may require several more hours of my time. I believe I have been diligent and that I have acted above and beyond that of which is expected of a named plaintiff to date and will continue to do so.

8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as a named plaintiff and class representative, and in consideration for my general release of all claims against Rady. I believe that amount is fair and reasonable in view of the work I have and will continue to perform on behalf of the Class, the State, and the aggrieved employees. I believe that my role in this lawsuit has resulted in a valuable benefit to the Class, the State of California and other aggrieved employees, and I accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful in this lawsuit. I believed in this case, so I was willing to be a named plaintiff to risk this and pursue this class action litigation. I also accepted the risk that news of this lawsuit could also potentially impact my ability to secure other work. At all times I believe I have acted in the best interests of the entire class.

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2 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and  
3 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

4 I declare under penalty of perjury under the laws of the United States that the foregoing  
5 is true and correct. Executed on April 1, 2025 at San Diego, California.

6 Signed by:  
7 *Kristin Diane Fleischman*  
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9 KRISTIN DIANE FLEISCHMAN  
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