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behalf of herself and on behalf of all persons similarly situated,

ADDITIONAL COUNSEL ON NEXT PAGE

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

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

Plaintiffs

v.

RADY CHILDREN’S HOSPITAL - SAN
DIEGO, a California Corporation; and DOES
1-10, inclusive

Defendants

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 JULIET BARNIA IN
SUPPORT OF PLAINTIFFS’ UNOPPOSED
MOTION FOR FINAL APPROVAL OF (1)
CLASS ACTION SETTLEMENT; (2)
ATTORNEYS’ FEES AND COSTS; and (3)
CLASS REPRESENTATIVE AWARDS**

Date: September 19, 2025
Time: 1:30 p.m.
Judge: Hon. Katherine Bacal
Dept.: C-63

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25 Attorneys for Plaintiff KRISTIN DIANE FLEISCHMAN,
26 Individually and on behalf of all others similarly situated,

I, JULIET BARNIA, hereby declare as follows:

1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement, Attorneys Fees and Costs, and Class Representative Award.
2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a witness I could and would do so.
3. To my recollection, I met with my Attorneys (either personally or via teleconference) on at least 11 occasions. Several of those meetings lasted in excess of 2 hours.
4. During these meetings, I would review and explain numerous documents turned over by Defendants from my employment. I would also explain my (as well as others') role during work. I also helped identify numerous other employees who could support the claims I was making in this lawsuit. I contacted many of these individuals myself to verify their willingness to participate.
5. I also spoke with my attorneys on the phone on numerous other occasions.
6. I sat for a full 1 days of deposition in this case. In preparation for these depositions, I spent several hours preparing with my attorneys. I also spent significant time reviewing the settlement documentation and discussing the settlement with my attorneys.
7. In total, I estimate that I spent at least 50 hours related to the above mentioned tasks directly working with my attorneys. I also spent at least another 8-10 hours of my own time gathering evidence and outlining issues that I later shared with my attorneys.
8. When I decided to move forward with this case, I was counseled by my attorneys of the potential stigma of being a Class Representative in a class action dispute, as this is a publicly filed lawsuit.
9. I was also advised when I brought this case that had we lost, I could have been personally liable for paying all of Defendants' costs. I was further advised this could be well into the tens of thousands of dollars on this type of case.

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10. Despite these risks I was committed to achieving a settlement that would benefit all employees working for Rady Children's Hospital - San Diego.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 26th day of August, 2025 at San Diego, California.

DocuSigned by:

Juliet Barnia

JULIET BARNIA