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Attorneys for Plaintiff Janine Mireles, individually and  
on behalf of all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SAN JOAQUIN**

JANINE MIRELES, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

LODI MEMORIAL HOSPITAL  
ASSOCIATION, INC.; ADVENTIST  
HEALTH SYSTEM/WEST; and DOES 1  
through 25, inclusive

Defendants.

Case No. STK-CV-UOE-2020-0004458  
ASSIGNED FOR ALL PURPOSES TO:  
The Honorable Erin Guy Castillo  
Department 10B

**REPRESENTATIVE ACTION**

**DECLARATION OF JANINE MIRELES  
IN SUPPORT OF MOTION FOR  
APPROVAL OF PRIVATE ATTORNEYS'  
GENERAL ACT ("PAGA") SETTLEMENT**

Date: August 29, 2023  
Time: 9:00 a.m.  
Dept: 10B  
Judge: Hon. Erin Guy Castillo

Complaint filed: June 2, 2020  
Trial date: Not set

1 I, Janine Mireles, declare as follows:

2 1. I am the named Plaintiff in the above-referenced action filed on behalf of the  
3 State of California and employees effected by the same policies I was subject to (“PAGA  
4 Settlement Members”), against Lodi Memorial Hospital Association, Inc. and Adventist Health  
5 System/West (collectively, “Lodi”), seeking civil penalties for certain labor code violations.  
6 I have personal knowledge of all matters stated in this declaration and could competently testify  
7 as to these matters if called as a witness, except as to the matters stated upon information and  
8 belief, and as to those matters, I believe them to be true.

9 2. I reviewed and signed the proposed Settlement Agreement and Release of PAGA  
10 Claims. Based on my attorneys’ evaluation and recommendation, and my involvement and the  
11 issues and risks involved in this case, I believe the proposed settlement obtained on behalf of  
12 the PAGA Settlement Members is a good result.

13 3. I am not aware of any interests I have adverse to the interests of the other PAGA  
14 Settlement Members or any conflicts with them.

15 4. I am not related to anyone associated with Lebe Law, APLC or Cohelan Khoury  
16 & Singer. My attorneys explained the Joint Prosecution Agreement between the firms to me and  
17 I reviewed and signed it.

18 5. I worked for Defendant as a Medical Assistant from September 2018 until March  
19 2020. After my employment ended, I searched for attorneys to discuss my work experiences and  
20 labor violations I believed I experienced. I retained Lebe Law, APLC and Cohelan Khoury &  
21 Singer to pursue a class and PAGA action which alleged Defendant did not pay all wages owed,  
22 provide meal and rest breaks, and reimburse for business-related expenses. Because I signed an  
23 arbitration agreement, the class action claims were dismissed.

24 6. In bringing this case for myself, the State of California, and the other employees,  
25 I understood a lot of work would be required of me and I was willing to, and did, work to keep  
26 the case moving forward. I had many calls and exchanged many emails with my attorneys,  
27 asking questions about the progress of the case, the meaning of the developments, and  
28 responding to all questions they had about my employment.

1           7.     I understood representing a group of employees and the State, and not just  
2 myself, the case would take much longer, I would not receive as much, and I would be the  
3 plaintiff in a publicly filed lawsuit, and not have a chance for a quick or private settlement.

4           8.     Despite these issues, I decided I would rather pursue a lawsuit with the potential  
5 to compensate more employees than just myself, and positively influence Defendant's policies,  
6 and insure all employees were treated fairly.

7           9.     I provided information to my attorneys, and their staff, used to file a claim with  
8 the State of California, which I understood was required before filing certain claims in court.

9           10.    After filing the State claim, I continued to respond to requests for information  
10 from my attorneys as they drafted the lawsuit and provided additional information, and  
11 reviewed the lawsuit before it was filed.

12          11.    I worked closely with my attorneys in order to respond to discovery which was  
13 served on me by Defendant which included Document Requests and Special Interrogatories.  
14 As part of my responses, I produced almost 100 pages of documents.

15          12.    To prepare to mediate, I discussed potential strengths and weaknesses in detail  
16 with my attorneys. I believe my thorough knowledge of Defendant's practices helped my  
17 attorneys to evaluate the claims and prepare for mediation.

18          13.    Following mediation, I reviewed and asked questions about the terms of the  
19 settlement, and after talking with my attorneys, reviewed and signed the Settlement Term Sheet.

20          14.    I took my duties and responsibilities to the other employees seriously, worked  
21 with my attorneys, and did all that was asked of me, to help enforce California's labor laws.

22          15.    Separate from this PAGA case for civil penalties, I believe I had independent  
23 claims for labor code violations. I agreed to settle all claims of any kind in exchange for a  
24 service payment of \$7,500 and sign a general release.

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

27                July 21, 2023  
28                Date

Janine Mireles  
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