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Attorneys for Plaintiff, Miriam Camarillo

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN JOAQUIN

MIRIAM CAMARILLO, an individual on behalf of herself and all others similarly situated, Plaintiff, v. LODI MEMORIAL HOSPITAL ASSOCIATION, INC., a California corporation; and DOES 1 to 100, Defendants.	CASE NO. STK-CV-UOE-2025-0007037 Related Case: Gill v. Lodi Memorial Hospital Association Case No. Case No.: STK-CV-UOE-2025-12196 Hon. Robert T. Waters Dept. 11B CLASS ACTION **DECLARATION OF MIRIAM CAMARILLO IN SUPPORT OF MOTION FOR COURT APPROVAL OF PAGA SETTLEMENT** Date: Time: Dept.: 11B Action filed: May 20, 2025

DECLARATION OF MIRIAM CAMARILLO IN SUPPORT OF MOTION FOR COURT APPROVAL OF PAGA SETTLEMENT

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I, Miriam Camarillo, declare:

1. I am one of the Plaintiffs in these related actions. The following is based on my personal knowledge, and if called as a witness, I would and could competently testify.

2. I worked for Adventist Health Orthopedic Department as a Medical Assistant from October 28, 2024, to February 17, 2025.

3. During the pendency of this case, I spent time with my attorneys discussing the nature of my complaints and the state of my case. I have assisted in the prosecution of this case by reviewing my own documents with the attorneys, identifying witnesses, reviewing documents from my attorneys, and answering discovery while the case was in arbitration. I participated in the mediation of this case telephonically and only gave my approval to settle after being fully informed by my counsel.

4. I understood that this action was being prosecuted on behalf of the State of California as a private attorney general, on my behalf, and for other aggrieved employees. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including frequently discussing the case with them and providing them with information. On the many occasions I have spoken with my counsel, I explained the company's policies and practices, as well as reviewing Defendant's produced documents. Further, I was involved in the negotiations that led to the settlement. I also reviewed and signed the Settlement Agreement, and this Declaration. Throughout this nearly one-year old case, I have continuously been kept apprised of the case status and was willing to take this matter to trial after my individual arbitration.

5. I was aware that the mere filing of the action and participation could jeopardize my future employability.

6. I am aware and have been aware from the inception of the case, that there is the risk that if I did not win, then I could be liable for Defendant's costs. I accepted that risk.

7. I understood from the inception of the case that a representative lawsuit could take longer than an individual action and I accepted that burden.

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8. I believe that the settlement is fair, adequate, and reasonable for the aggrieved employees and the State of California. I am proud of the result and accomplishment of this lawsuit given the procedural posture of this case and the likelihood of recovery at trial.

9. I support my attorneys' request for fees as I believe the attorney fee request of $217,000.00 to be reasonable in light of the excellent work and favorable result my attorneys achieved for me and the aggrieved employees. I understand that the attorneys are requesting to be awarded attorneys' fees of $217,000.00 of the gross settlement fund of $620,000.00. The request of $217,000.00 is fair and reasonable especially in light of the work performed and the excellent result received. I further support my attorneys' request for reimbursement of all costs of up to $35,000.00. Accordingly, I do believe that the attorneys' costs request of a maximum amount of up to $35,000.00 should be approved as reasonable and necessary.

10. I signed a Joint Prosecution Agreement approving the following fee split between my counsel's firms and the other lawyers in the related matters:

Attorney	Percentage of Fee Award
Janelle Carney – Attorney at Law APC	25%
Frontier Law Center	25%
Blumenthal Nordrehaug Bhowmik De Blouw LLP	38.75%
Centurion Trial Attorneys, APC	11.25%

11. Based on the excellent result, I reiterate my full support for the entirety of the settlement and request that the Court enter the proposed Approval Order.

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

Executed at 1, California, on 6/26/2026

Signed by:
Miriam Camarillo
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Miriam Camarillo