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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF SAN DIEGO**

15 JACQUELYN CRANTON and KATRENA
16 ARNOLD, individuals, on behalf of
17 themselves and on behalf of all persons
18 similarly situated,

19 Plaintiffs,

20 vs.

21 GROSSMONT HOSPITAL CORPORATION,
22 a California Corporation; and DOES 1 through
23 50, inclusive,

24 Defendants.

CASE NO.: **37-2022-00001574-CU-OE-CTL**

[Consolidated with Case No.
37-2022-00024671-CU-OE-CTL]

**DECLARATION OF KATRENA ARNOLD
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Hearing Date: March 29, 2024

Hearing Time: 9:30 a.m.

Judge: Hon. Gregory W. Pollack
Dept.: 71

Date Action Filed: January 13, 2022
Trial Date: Not set

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DECLARATION OF KATRENA ARNOLD

1 I, Katrena Arnold, declare as follows:

2 1. I am over the age of eighteen, a Plaintiff and a proposed Class Representative in the
3 above-entitled matter. I submit this declaration in support of the Motion for Preliminary Approval
4 of Class Settlement and in support of my application for a Class Representative Service Payment.
5

6 2. I have personal knowledge of all the facts stated herein. I could and would competently
7 testify under oath to these facts in court if requested to do so.

8 3. I worked for defendant Grossmont Hospital Corporation (“Grossmont Hospital”) in
9 California from November of 2022 to December of 2022 and during that time period I was
10 classified by Grossmont Hospital as a non-exempt employee.

11 4. In July of 2023 I retained my attorneys who are experienced in both class action and
12 PAGA representative action litigation and claims against employers for violations of the
13 California Labor Code. I have no personal relationship or family ties to my attorneys or any
14 officer of the Court. I am not aware of having any actual or potential conflicts of interest with
15 another class member in this case nor am I aware of having any actual or potential conflicts of
16 interest with ILYM Group, Inc., the settlement administrator. I am not aware of any other pending
17 matter or action asserting claims that will be extinguished or adversely affected by this settlement.
18

19 5. I decided to pursue this class action lawsuit and be a plaintiff/class representative
20 because I felt that my legal rights as an employee and others like me were violated. I was often
21 unable to take compliant meal or rest breaks because, for example, my breaks were not duty-free.
22 This is because immediately after clocking in for my shifts, I was required to locate my assigned
23 hospital phone, which was either at the front desk or in the possession of the outgoing nursing
24 assistant. From the moment I obtained my assigned phone, under Defendant’s policies and
25 procedures, as monitored and enforced by Defendant’s supervisory personnel, I was required to
26 remain engaged with Defendant’s phone at all times during my shifts, including, during my meal
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DECLARATION OF KATRENA ARNOLD

1 periods and rest breaks. I also did not receive the meal or rest break premium payments I was
2 entitled to when these violations occurred.

3 6. I spoke to my attorneys several times and discussed how Grossmont Hospital
4 implemented its company policies and procedures. I also assisted my attorneys in their
5 investigation into my claims by providing them documents and answering their questions. I
6 reviewed the amended complaint before it was filed and was given access to an electronic file
7 sharing program that alerted me via email when important documents were filed so that I could
8 review them and keep up with the developments in the case which I understood was one of my
9 duties as a class representative. I could also access court filings from this case on my attorney's
10 law firm website.
11

12 7. Even though this action is in the process of settling, I was and remain prepared to
13 perform all the duties of a class representative. I understand that as a class representative I have
14 assumed a fiduciary responsibility to prosecute this class action on behalf of the absent class
15 members. I have understood that as a fiduciary, I have a duty to prosecute this action for the
16 benefit of the class members and surrender any right to compromise the group action for an
17 individual gain.
18

19 8. I understood that being a plaintiff/class representative in this case meant that I was
20 seeking damages not only for myself but also other current and/or former non-exempt employees
21 working for Grossmont Hospital in California who make up the class. I felt that these individuals
22 were not aware of their labor law rights and even if they were they would probably be
23 apprehensive about speaking up or even simply because of the time, effort and risk involved in
24 filing a class action lawsuit.
25

26 9. I understood that being a part of this lawsuit involved risks. For example, my
27 attorneys explained to me that if the case went to trial and we lost, I could be held responsible to
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DECLARATION OF KATRENA ARNOLD

1 pay for all or part of the attorney fees and costs paid by Grossmont Hospital to defend this lawsuit.
2 Also, I knew there was a risk that future employers, if they ever find out about this lawsuit, could
3 hold it against me or downgrade me as a potential hire. As one of only two named Plaintiffs in
4 this case it would not be difficult for a future employer to become aware that I sued a former
5 employer for labor law violations. Ultimately I decided these risks were worth it and decided to
6 fight for my rights and the rights of others regardless of the risks, time and effort I spent on this
7 case.
8

9 10. During the lawsuit I stayed in touch with my attorneys by phone and email. I also
10 kept up to date on important developments by reviewing court filings that were made available to
11 me electronically as I described above.
12

13 11. A mediation took place on December 20, 2023 with Jeffrey Ross, a well-respected
14 and experienced mediator of wage and hour class actions. After the mediation the parties were
15 able to reach an agreement to settle the action based on a mediator's proposal. I communicated
16 with my attorneys regarding the terms of the settlement which was reached between the parties
17 and understood that I was representing absent class members and therefore wanted the best
18 possible result to be obtained for the class members and I believe a very positive result was in fact
19 achieved via settlement.
20

21 12. I have been actively involved with this lawsuit performing the duties described above.
22 Although I did not keep time records, I was in regular contact with my attorneys, reviewed court
23 filings and spent a significant amount of time on the issues presented during the lawsuit and in the
24 settlement process. I estimate that I spent approximately 20-30 hours working on this case up
25 until this point. I believe I have been diligent and have done what is expected of a named plaintiff
26 and a proposed class representative to date, and will continue to do so. I have and always will
27 maintain the best interest of the class members.
28

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1 13. My attorneys explained to me that the settlement process involves a two-step
2 review by the Court to determine whether the settlement is fair before approving the settlement. I
3 know this process also involves notifying all class members of the settlement terms and of their
4 rights to make a claim for their settlement share, to opt out of the settlement or to object to the
5 settlement.
6

7 14. I believe I did the right thing by filing this case on behalf of the class members who,
8 subject to court approval, are in line to receive monetary payments as a result of this case and
9 settlement. This is money they may never have ever gotten if I did not pursue this action on their
10 behalf. I feel significant personal satisfaction to know that I played a role in the class members
11 being entitled to monetary payments as a result of the filing of this lawsuit. I also believe that the
12 requested Class Representative Service Payment of \$12,500 from the settlement is fair
13 compensation for the work I performed and the risks I undertook.
14

15 15. As part of the settlement it was necessary for me to sign a general release of claims I
16 may have against Grossmont Hospital. I believe the Class Representative Service Payment I have
17 requested provides me with some compensation for this agreed release.

18 16. In light of all the time and effort I have spent on this case, the risk I undertook by
19 suing a former employer, the exposure to being responsible for paying the defendant's costs in the
20 event we did not win the case, the reputational risk that future employers may hold this lawsuit
21 against me, the general release and in light of the size of the settlement, I believe the request for
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DECLARATION OF KATRENA ARNOLD

1 \$12,500 as a Class Representative service payment is fair and reasonable.

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

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5 Executed on Mar 4, 2024, at Potrero, Ca.
6 (city, state)

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Katrena Arnold (Mar 4, 2024 06:39 PST)
Katrena Arnold

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DECLARATION OF KATRENA ARNOLD