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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

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

Plaintiffs,

vs.

WHITE FIR HOLDINGS, LLC d/b/a MID-
TOWN OAKS POST-ACUTE, a Delaware
Limited Liability Company; PLUM
HEALTHCARE FOUNDATION, a California
Corporation; PLUM HEALTHCARE GROUP,
LLC, a California Limited Liability Company;
GI SIDE FUND PLUM CORP., a Delaware
Corporation; CALIFORNIA OPCO SUB, LLC,
a Delaware Limited Liability Company; and
DOES 1-50, Inclusive.

Defendants.

Case No. 34-2021-00301656

**DECLARATION OF PLAINTIFF DORETHA
JACKSON IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL
OF CLASS AND PAGA ACTION
SETTLEMENT**

Hearing Date: April 28, 2023
Hearing Time: 9:00 a.m.
Department: 28

Trial Date: Not Set
Action Filed: May 27, 2021

Reservation No. 2712082

1 I, DORETHA JACKSON, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above
4 wage and hour class action filed against WHITE FIR HOLDINGS, LLC d/b/a MIDTOWN OAKS
5 POST-ACUTE, PLUM HEALTHCARE FOUNDATION, PLUM HEALTHCARE GROUP, LLC, GI
6 SIDE FUND PLUM CORP., and CALIFORNIA OPCO SUB, LLC (hereinafter "Defendants").

7 2. This declaration is being submitted in support of Plaintiff's Motion for Preliminary
8 Approval of Class and PAGA Action Settlement.

9 3. I believe that I am, have been and will continue to represent the interests of the class
10 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
11 to represent.

12 4. Generally, my lawsuit claims that Defendants failed to pay for all hours worked, failed to
13 provide lawful meal and rest periods, failed to provide accurate itemized wage statements, failed to
14 provide wages when due, and failed to reimburse employees for required expenses. I performed work
15 for Defendants between January of 2019 to April of 2020.

16 5. I believe that my claims are typical of the claims of the Class Members that I am seeking
17 to represent because I worked for Defendants and was subject to the same practices affecting all other
18 Class Members concerning unpaid minimum and overtime wages, missed meal and rest periods,
19 unreimbursed business expenses, and received similar wage statements. Therefore, legally and
20 factually, I share the same claims as all other Class Members and can represent those workers
21 adequately. My claims and the Class Members' claims arise from the same course of conduct by
22 Defendants, involve the same policies, are based on the same legal theories, and are subject to the same
23 defenses.

24 6. I do not have any conflicts of interests with other Class Members, and have prosecuted
25 the case vigorously on behalf of the Class. My interests are entirely coextensive with the interests of
26 the Class. I allege that I was injured by the same company-wide policies and practices to which the
27 proposed Class was subjected and seek the same relief. I have already demonstrated my ability to
28

1 advocate for the interests of the Class by initiating this litigation, undertaking extensive class discovery,
2 and evaluating the proposed settlement to assure that it is fair.

3 7. I am aware of my duties as the representative of the Class and have actively participated
4 in the prosecution of this case to date. I have communicated with counsel, provided documents to
5 counsel and participated in the investigation and negotiations in the Action. My interests are aligned
6 with those of the Class. Like the rest of the Class Members, I seek monetary relief under the same set
7 of facts and legal theories.

8 8. I understood at the time that I filed this action, that as a Class Representative, I owed a
9 duty to the putative class members to faithfully prosecute this action with their best interests at the
10 forefront of every decision. I understood that I could not make any decision in this action for the sole
11 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
12 sacrifice my personal best interests for the benefit of the interests of the putative class members.
13 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
14 relief for the Class for what I perceived to be Defendants' unlawful wage and hour practices. I believe
15 that I faithfully executed the duties of a Class Representative throughout this litigation and will continue
16 to do until this litigation is fully and finally resolved.

17 9. I believe that the proposed settlement before the Court is fair, reasonable and adequate,
18 and made in the best interest of the Class Members. Consequently, I respectfully, and humbly, I ask
19 the Court to grant preliminary approval of the Settlement and all of its terms.

20 I declare under the penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed Mar 29, 2023, at Sacramento, California

22
23 By: 
Doretha Jackson (Mar 29, 2023 09:29 PDT)
24 DORETHA JACKSON