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Superior Court of California
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12/09/2025
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11 Attorneys for Plaintiffs
12 JANE DOE I and JANE DOE II

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

14 **COUNTY OF SACRAMENTO**

15 JANE DOE I and JANE DOE II, on behalf of
16 themselves and all others similarly situated,

17 Plaintiffs,

18 v.

19 SUTTER HEALTH,

20 Defendant.

CASE NO. 34-2019-00258072-CU-BT-GDS

CLASS ACTION

**DECLARATION OF JANE DOE II IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS AND
INCENTIVE AWARDS**

Date: February 27, 2026
Time: 9:00 a.m.
Dept.: 22
Judge: Hon. Lauri A. Damrell

Reservation Number: A-258072-039

Action Filed: June 10, 2019
Trial Date: None Set

1 I, Jane Doe II, declare:

2 1. I am one of the named Plaintiffs and proposed class representatives in the above-
3 captioned class action lawsuit against Defendant Sutter Health (“Sutter”). I submit this Declaration
4 in support of Plaintiffs’ Motion for Attorneys’ Fees, Costs and Incentive Awards. I am personally
5 familiar with the facts that are provided in this declaration. If called as a witness, I could and would
6 competently testify to the matters stated herein.

7 2. It is my understanding that I am a member of the proposed class I am seeking to
8 represent. I decided to serve as a class representative in this class action lawsuit against Sutter
9 without any promise of receiving anything other than that received by the class. By serving as a
10 class representative, it is my goal to ensure that all patients of Sutter who are class members in this
11 case are properly compensated.

12 3. It is my understanding that this lawsuit could not have been brought on behalf of
13 class members unless a Sutter patient, such as myself, decided to serve as a class representative. In
14 deciding to serve as the class representative in this case, I also understood there was a potential of
15 my name and private health information being disclosed publicly for purposes of this case. Despite
16 this risk, and despite the fact that I would not normally consent to such information being disclosed,
17 I agreed to serve as a class representative.

18 4. I believe I have fulfilled my responsibilities as a class representative. I participated
19 in the litigation and provided the following services to the class:

20 a. I reviewed and approved certain court-filings including, but not limited to,
21 the initial Class Action Complaint.

22 b. I reviewed and responded to written discovery requests by Sutter, including
23 approximately 91 Requests for Production (“RFP”), 60 Requests for
24 Admission, and Form Interrogatories.

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- c. I searched for documents related to this lawsuit and responsive to the RFPs, which included but was not limited to my having to download my Facebook DYI and Google Takeout files on multiple occasions, deciphering and taking screenshots of my various device and browser settings, and searching through numerous social media posts. These tasks alone were very time-consuming.
- d. I prepared for my deposition and was deposed for a full day.
- e. I spoke with my attorneys both before and after mediation took place and made sure I was available and reachable during the mediation sessions.
- f. I reviewed the Settlement Agreement and discussed the terms with my attorneys. I reviewed and signed my declaration in support of the Motion for Preliminary Approval.
- g. I stayed informed and communicated with my attorneys regarding the status and progress of this lawsuit throughout the course of this litigation, which has been going on for almost six years.

5. These activities required time and resources that could have been spent on other things. In total, I have spent at least 50 hours participating in this litigation and providing the aforementioned services to the class thus far.

6. I think the \$10,000 incentive award my lawyers have requested, which the Settlement Agreement allows, subject to the Court’s approval, is a fair amount for the time I spent as class representative and for the privacy concerns that came with fulfilling that role.

7. I remain ready, willing, and able to continue actively participating in this lawsuit and fulfilling my responsibilities as a class representative through final disposition, including attending and providing testimony at trial if necessary.

8. I am not aware of any conflicts between my own interests and the interests of other class members. Additionally, I am not aware of any such issues relating to my attorneys. I am not related to, nor am I employed by, any of the attorneys representing the class.

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9. I am aware that my attorneys have a fee splitting agreement and I have agreed to it in writing.

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

Executed on 11/25/2025, at Crescent City, California.

Jane Doe II
Jane Doe II

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 8648 Wilshire Boulevard, Beverly Hills, CA 90211-2910.

On December 9, 2025, I served true copies of the following documents described as **DECLARATION OF JANE DOE II IN SUPPORT OF MOTION FOR ATTORNEYS' FEES, COSTS AND INCENTIVE AWARDS** on the interested parties in this action as follows:

Robert H. Bunzel
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Attorneys for Defendant Sutter Health

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent by e-mail to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on December 9, 2025, at Beverly Hills, California.



Jessica Mendez