

## **Exhibit F**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION

Kevin Faile, Louis C. Roman, Alan R. )  
DePalma, and Brian Scott Craton, all )  
individually and on behalf of all )  
other similarly situated individuals, )

Plaintiffs, )

vs. )

Lancaster County, South Carolina, )

Defendant. )  
\_\_\_\_\_ )

Civil Action No. 0:10-cv-2809-CMC

**AFFIDAVIT OF HELEN A. ORTEGA**

STATE OF SOUTH CAROLINA )

COUNTY OF LANCASTER )

PERSONALLY appeared before me Helen A. Ortega, who, after being duly sworn, deposes and states the following:

1. My name is Helen A. Ortega. I am older than eighteen years of age. The statements in this Affidavit are based upon my own personal knowledge.

2. I am presently employed as a paramedic for the Lancaster County EMS Department, where I have been employed since January 20, 2009.

3. I serve on the Plaintiffs' Steering Committee in the above-captioned case and was selected to be the Recording Secretary for the Committee. My role was to keep the minutes of the Committee and to record any votes of the Committee to take any official action with regard to the case. I attended every formal meeting of the Committee and actually hosted most of the meetings

at my home.

4. I have spent many hours of my own time in connection with the is case since October 2010, from planning, hosting, and attending meetings of the Plaintiffs' Steering Committee, to reviewing pleadings and other documents, and assisting with the preparation of discovery responses.

5. I attended both mediations of this case on behalf of the Plaintiffs' Steering Committee.

6. I have reviewed the Settlement Agreement in this case, and it accurately reflects the terms of the settlement the Steering Committee voluntarily reached with the County in this case. The Committee members voted unanimously in favor of the Settlement Agreement. I voted in favor of the settlement because I believe that it is fair and reasonable and in the best interest of the class of Plaintiffs as a whole.

7. We understand that by agreeing to settle this case, we are giving up our right to proceed to a trial in this matter; however, we are willing to compromise the value of the lawsuit some to avoid the uncertainties of a trial and to avoid the expense and delay of continuing the discovery and litigation of this case.

8. Mr. Rothstein has explained in great detail the legal and factual issues that are in dispute in this case. We understand that there are several unresolved questions of fact and law that could make the outcome of a trial uncertain. There is a very real risk that we could recover less than the amount of the settlement if we went to trial on this case, plus the additional costs of going forward would reduce our net recovery from a trial. Mr. Rothstein explained that the potential for appeals in this case could delay any recovery even further, by up to another 18 months to two years.

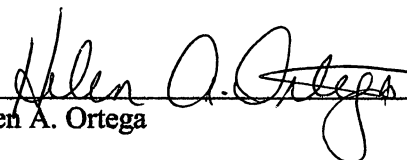
9. I am very satisfied with the legal services provided to us by our lawyer in this case,

David Rothstein. He has kept the Steering Committee fully informed about the progress of the case and has always been available to answer any questions I had throughout the case. I believe that Mr. Rothstein worked diligently throughout case, and his efforts certainly increased the value of this case.

10. The Plaintiffs' Steering Committee voted in favor of the proposed settlement apportionment of this case after considerable debate and discussion among the Committee members, including the specific amounts for attorneys' fees, costs, and additional premium payments for the named Plaintiffs and the Committee Members. When I agreed to serve on the Committee, I did not anticipate or expect to receive any additional compensation for my service; however, I believe that the amounts the Committee agreed on are fair and reasonable and reflect the level of work each Plaintiff or Committee member undertook on behalf of the group, all with considerable risk of retaliation for our participation in this case.

11. I sincerely believe that the proposed settlement is in the best interest of the Plaintiff class in this case.

FURTHER AFFIANT SAYETH NOT.

  
Helen A. Ortega

SWORN to and subscribed before me,  
this 11<sup>th</sup> day of January, 2012

 (L.S.)  
Notary Public for South Carolina

My commission expires: 01/15/2020

