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Attorneys for Plaintiff JOY OLIVER-BANKS,
in a Representative capacity only, and on behalf
of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF IMPERIAL

JULIA TORRES, JOSE GOMEZ, and JOY
OLIVER-BANKS in a Representative capacity
only, and on behalf of other members of the
general public similarly situated,

Plaintiffs,

v.

MANAGEMENT & TRAINING
CORPORATION, a Delaware Corporation; and
DOES 1-10, inclusive

Defendants

Case No.: ECU003320

Honorable Jeffrey Jones
Department 5

**DECLARATION OF JOY OLIVER-
BANKS IN SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

**DECLARATION OF JOY OLIVER-BANKS IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**



DECLARATION OF JOY OLIVER-BANKS

I, Joy Oliver-Banks, declare:

1. I am over the age of 18 and am a named Plaintiff and class representative in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. This declaration is submitted in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement in this matter.

3. I have worked for Defendant MANAGEMENT & TRAINING CORPORATION ("Defendant"), as a non-exempt employee since approximately October 2018 until or about March 1, 2023.

4. From the time of the filing of the lawsuit, I have understood that this is a class action lawsuit where I represent the interests of all individuals who were employed by Defendant in California and classified as non-exempt employees at any time during the Class Period, excluding all those who previously released their claims in prior settlements (the "Class Members").

5. I believe while working for Defendant, I and all Class Members were subject to the same policies and procedures regarding payment of minimum and overtime wages, meal breaks, payment of meal break premium wages, rest breaks, payment of rest break premium wages, wage statements, waiting time penalties, failure to maintain required records, indemnification for business related expenses, unfair competition, and the timely pay of wages. I believe that the claims of all Class Members are identical to mine because Defendant's policies and procedures applied to all of us.

6. I understand that I must continue to consider and protect the interests all Class Members. I have been protecting the rights of myself and all Class Members since approximately April 2023 when first I started looking for an attorney before this lawsuit was filed. I have been and continue to place the interest of all Class Members above my own. I do not have a conflict with the members of the Class I seek to represent.

7. I provided information and been available to my attorneys since approximately April

J.B.

2023 when I was searching for my attorney. I have helped and been willing to support the lawsuit in any way I can for the last approximately 30 months since April 2023 when I began searching for an attorney for the claims in this lawsuit. I have searched for an attorney, met with my attorneys to see if they would represent me, met with my attorneys to discuss the Defendant's policies, procedures, and practices for clocking in and out, paying wages for the hours that we worked, payment of commissions and bonuses, providing meal breaks, providing rest breaks, payment of premium wages, providing compensation for work-related purchases, keeping required records, waiting time penalties, unfair competition, wage statements, and the timely payment of wages. I spent time searching for policies and procedures that were given to me during my employment, any timecards I had, any pay stubs I had, W2s, and other documents related to my employment. I produced all the documents to my attorneys. I responded to almost all of my attorneys' telephone calls and interviews and I met with them in person and/or telephonically to discuss any questions they had about my employment, Defendant's policies and procedures, Defendant's paying of minimum and overtime wages, Defendant's providing of meal and rest breaks, paying premium wages, providing wage statements, providing compensation for work-related purchases, or the documents I had provided to them. I made myself available during the mediation session. Once the settlement agreement was finalized, I conferred with my attorneys on multiple occasions to review and discuss the agreement before signing.

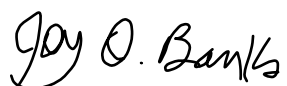
8. I also understand that in the event this matter proceeds to trial, I must come to court to participate in the trial. I will come to court if I am needed and have been ready to perform any responsibility that is necessary for this lawsuit. I know that I took a risk by filing this lawsuit because if I lost, I would have to pay for all the costs incurred by Defendant in the lawsuit. I also have the risk of losing income for any time that I would have to spend fulfilling my responsibilities including having to attend the trial. I also believe I have taken a risk by filing this lawsuit because my employers in the future may find out that I sued my employer, and they may not like it. The other employees will be receiving money from this lawsuit and they have not had to file a lawsuit, look for an attorney, or take the risks that I have had to take.

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9. I understand that the settlement we have reached in this case must be approved by the Court and I must protect the interests of all Class Members.

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

Executed this 14 day of November 2025, at Los Angeles, California.



JOY OLIVER-BANKS

