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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN BERNARDINO**

DAEMIAN MARTIN and ROGER JOHNSON, as
 individuals and on behalf of all others similarly
 situated, and as private attorneys general,

Plaintiffs,

vs.

LOMA LINDA UNIVERSITY MEDICAL
 CENTER, a California corporation; and DOES 1
 through 50, inclusive,

Defendants.

Case No. CIVDS2017184

[Assigned to Hon. Nicole Quintana Winter]

**DECLARATION OF DAEMIAN MARTIN IN
 SUPPORT OF PLAINTIFFS' MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION SETTLEMENT**

Date: June 30, 2025
 Time: 9:00 a.m.
 Department: S29

Complaint Filed: August 17, 2020
 FAC Filed: February 5, 2021

1 I, Daemian Martin, declare as follows:

2 1. I am one of the named plaintiffs in the above-referenced matter. I make this declaration
3 based on my own personal knowledge, except as to matters stated on information and belief that I
4 understand to be true. If called as a witness, I could testify competently as to the facts stated in this
5 declaration.

6 2. I began working for Loma Linda University Medical Center around August of 2013. I
7 understand that I am bringing claims against the company for the underpayment of sick pay wages in
8 this class action lawsuit. During my employment as a registered nurse, I was paid as an hourly employee
9 and routinely earned non-base hourly wages or other non-hourly, non-discretionary remuneration,
10 including for example shift differentials and bonuses. I also was provided paid sick leave that I could
11 elect to use by entering a "SCK" pay code. When I elected to use paid sick leave in workweeks that I
12 earned both non-base hourly wages or other non-hourly, non-discretionary remuneration, my sick leave
13 was paid at my base hourly rate only.

14 3. During the pendency of this lawsuit, I have done my best to represent the interests of the
15 employees that are part of the class. I have actively contributed to the litigation of this case. My
16 contributions include but are not limited to (i) participating in numerous telephonic meetings with my
17 attorneys and their staff to discuss the case and review documents prepared on my behalf, (ii) providing
18 my attorneys with information and documents regarding my employment, (iii) searching for additional
19 information and documents requested by my attorneys, (iv) reviewing and approving the written notice
20 to the Labor and Workforce Development Agency, the complaint, and other papers filed with the court,
21 (v) reviewing documents and information my attorneys were provided by the company or its attorneys,
22 (vi) participating in the discovery process and reviewing related documents, (vii) being available for a
23 mediation, (viii) reviewing and signing the settlement agreement and related documents, and (ix)
24 reviewing and signing documents submitted to this Court in support of the settlement. Since initiating
25 litigation against the company in August of 2020, I estimate that I at a minimum have spent around one
26 hour per month, on average, to further the litigation.

27 4. I have taken all necessary steps to represent the interests of the Class, including by
28 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,

and answering any questions that have come up. I remain willing to devote my time to this lawsuit for the benefit of the Class. I do not believe I have any interests that are adverse to the interests of the Class. I also am unaware of any such issues having been raised or presented by anyone else.

5. I believe many employees would not sue their employer out of fear. I took on risks by bringing this lawsuit, and I understand that other people will benefit because of the actions that I have taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class settlement is fair, adequate, and reasonable.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 7 day of May 2025, at Beaumont, California.

Signed by:
Daemian Martin

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Daemian Martin