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Attorneys for Plaintiffs JOEY STEPHENS, MANUEL
MARTINEZ, ERIC MCINTYRE, JEREMY CAPPS, and
TYLER IRISH, on behalf of themselves and all others
similarly situated

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

JOEY STEPHENS, MANUEL MARTINEZ,
ERIC MCINTYRE, JEREMY CAPPS, AND
TYLER IRISH, an individual, on behalf of
themselves and others similarly situated,

PLAINTIFFS,

v.

HALL AMBULANCE SERVICE, INC.; and
DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. BCV-20-101643

[Case Assigned for All Purposes to Hon Thomas
S. Clark in Dept. 17]

**DECLARATION OF MANUEL
MARTINEZ IN SUPPORT OF FINAL
APPROVAL OF CLASS SETTLEMENT**

Date: August 1, 2023

Time: 8:30 A.M.

Dept.: 17

Complaint Filed: July 16, 2020

FAC Filed: August 7, 2020

1 I, MANUEL MARTINEZ, state and declare as follows:

2 1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the
3 above-captioned matter. The following is based upon my personal knowledge, and if called as a
4 witness, I could and would testify competently thereto.

5 2. I am a former employee of Defendant HALL AMBULANCE SERVICE, INC.
6 (“Hall Ambulance” or “Defendant”) as an hourly employee.

7 3. I brought this lawsuit, on behalf of myself and all other Class Members, against
8 Defendant because I believe that Hall Ambulance failed to pay wages and/or overtime, provide
9 meal breaks, authorize and permit rest periods, pay minimum wage, and pay wages at the time of
10 termination to me and other employees.

11 4. I understand that I am representing other employees and I believe that I am able to
12 represent them well.

13 5. I first began talking with attorney Aaron Kaufmann in approximately May 2019. I
14 helped set up a meeting with Mr. Kaufmann and other Hall Ambulance employees held in July
15 2019. At the meeting, Mr. Kaufmann interviewed me and the others about the pay, meal and rest
16 period, and other practices at Hall Ambulance. After I retained counsel, I compiled relevant
17 documents from my employment to assist my attorneys in investigating and litigating this case. I
18 worked with my attorneys to develop the facts and legal claims in this lawsuit and directed several
19 witnesses to Mr. Kaufmann to further the investigation of the case. The lawsuit was filed in July
20 16, 2020.

21 6. Throughout the litigation, I have provided my attorneys with helpful information
22 for this lawsuit and for the Settlement as needed. Additional work in connection with this matter
23 includes providing information to my attorneys regarding my employment with Defendant,
24 staying in regular contact with my attorneys to discuss the status of the case, responding promptly
25 to my attorneys’ various communications regarding this matter, attending a full-day mediation in
26 March 17, 2021; and reviewing and analyzing the settlement agreement and settlement papers to
27 ensure the settlement was fair and reasonable and in the best interests of the Class Members.

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1 7. I estimate the total time spent in connection with this matter is approximately 35-
2 45 hours.

3 8. I have worked to actively represent the other Class Members and their interests.

4 9. I have always kept the Class Members' interests at heart in this litigation.

5 10. I am prepared to continue assisting with this litigation and am committed to
6 achieving the best possible results for the Class.

7 11. I believe that the class action settlement obtained on behalf of the Class is fair and
8 reasonable considering the issues involved in this case. As mentioned above, I reviewed and
9 discussed the Settlement Agreement with my attorneys and asked them questions about it to
10 ensure that I understood its terms and what it would mean for all of the class members.

11 12. I believe that I have fairly represented the absent Class and request that the Court
12 finally approve this settlement and confirm me as Class Representative.

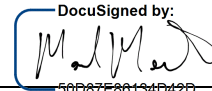
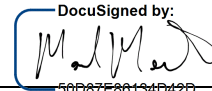
13 13. I am not aware of any conflicts of interest that prevent me from being confirmed
14 as Class Representative in this action. I am not related in any way to my attorneys or to any other
15 member of the firm that is representing me. I have no business dealings or other involvement
16 beyond this lawsuit and this representation. I have not been promised any money or inducement
17 to serve as Class Representative in this action.

18 14. It is my opinion that the settlement agreement provides for a fair and adequate
19 enhancement for me as a Class Representative, in the amount of \$10,000. I believe that this is
20 fair and reasonable considering all of the work that I have performed in my role as Class
21 Representative. As Class Representative, I have actively participated in all stages of the litigation,
22 as detailed above, and have always maintained the best interests of the Class while performing
23 my Class Representative duties.

24 15. It is also my opinion that the Class Representative enhancement is fair, reasonable,
25 and adequate because, in addition to the many hours spent participating in the prosecution of this
26 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
27 were unsuccessful in this action. Likewise, I risk the potential stigma of being a Class
28 Representative in a class action labor dispute, which may affect my future employability.

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

3 Executed on 7/10/2023 at Lancaster, California.

4  DocuSigned by:
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7 MANUEL MARTINEZ
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On July 10, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF MANUEL MARTINEZ IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

**JEFFER MANGELS BUTLER
& MITCHELL LLP**
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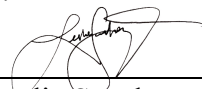
☐ **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

☒ **BY ELECTRONIC MAIL TRANSMISSION:** I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 10, 2023, at Sherman Oaks, California.



Leslie Sanchez