

Justin F. Marquez, Esq. (SBN 262417)
justin@wilshirelawfirm.com
Benjamin H. Haber, Esq. (SBN 315664)
benjamin@wilshirelawfirm.com
Daniel J. Kramer, Esq. (SBN 314625)
dkramer@wilshirelawfirm.com

WILSHIRE LAW FIRM
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Telephone (213) 381-9988
Facsimile: (213) 381-9989

*Attorneys for Plaintiffs and Proposed
Class Members*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

LAUREN FLETCHER HERNANDEZ,
individually, and on behalf of all others
similarly situated,

Plaintiff,

v.

FACEY MEDICAL FOUNDATION, a
corporation; FACEY MEDICAL GROUP, a
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No. 20STCV41624

[Assigned to: Hon. Carolyn B. Kuhl, Dept.
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**SUPPLEMENTAL DECLARATION OF
LAUREN FLETCHER HERNANDEZ IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

SUPPLEMENTAL DECLARATION OF LAUREN FLETCHER HERNANDEZ

I, Lauren Fletcher Hernandez, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am a named Plaintiff in this action and submit this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

3. This declaration supplements the declaration I previously submitted to this Court on August 4, 2023.

4. Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request of a \$12,500 service payment for my role as the lead Class Representative.

5. As detailed in my previous declaration, I have spent a substantial amount of time on this case and far more time than the other plaintiffs in this action based on my understanding. I have spent time searching for and collecting documents related to my employment, regularly speaking with my attorneys throughout the litigation, preparing for depositions, attending a full-day deposition, responding to written discovery, helping my attorneys with important motions, helping my attorneys prepare for mediation, discussing the settlement, and reviewing/signing documents related to the settlement. I estimate that, as of today, I have spent at least 75 hours on this case and likely much more.

6. I have been actively involved in this case since it was initiated in 2020. By filing this case as a class action, I understood that I would be bringing claims on behalf of myself and other employees. I also understood that class actions take longer to resolve than individual actions, and I therefore took the risk in delaying potential recovery to me that would have been faster to obtain if I pursued this case on an individual basis.

7. Since this case was filed in October 2020, I have had financial difficulties and have needed to borrow money from family and friends to pay for basic living expenses, including medicine. Even though I could have pursued faster recovery on an individual basis only, I chose to pursue the claims through this class action to benefit other members of the class. I am relieved

1 that this case is coming to an end so that other employees and I can be compensated.

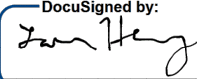
2 8. I was employed by Facey Medical Foundation ("Facey") for approximately 14
3 years. Since my employment with Facey ended in 2020, I have had difficulties obtaining
4 employment with other employers. For example, I have been without employment for the past
5 year despite having at least a dozen interviews with prospective employers. I believe that
6 prospective employers may be aware that I was involved in this lawsuit, which I believe is hurting
7 my employability with other employers.

8 9. This case has also caused me stress and anxiety because I did not know when, if
9 ever, I would be able to receive compensation for the claims. I also have felt anxiety knowing that
10 my name is associated with a lawsuit that I filed against one of my former employers. However,
11 even though other employees may have been afraid to bring this lawsuit, I was not afraid to do so
12 and I know that my actions have helped other employees because they will receive some
13 compensation from Facey and because Facey will have improved their policies as a result of this
14 lawsuit.

15 10. I again respectfully request that the Court award me the \$12,500 service payment
16 as allowed in the Settlement Agreement. I also thank the Court for its efforts in handling this
17 lawsuit.

18 I declare under penalty of perjury, under the laws of the State of California and the United
19 States of America, that the foregoing is true and correct.

20 Executed on 4/4/2024 at Northridge, California.

21 DocuSigned by:
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23 0468A539E7C842D...
24 Lauren Fletcher Hernandez
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Hernandez v. Facey Medical Foundation Corp., et al.
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PROOF OF SERVICE