

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Tara Zabehi (SBN 314706)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

CHUMANI BROWN, individually, and on
behalf of other members of the general
public similarly situated, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;
OSCAR MORALES, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiffs,

vs.

MED ONE GROUP, an unknown business
entity; MED ONE CAPITAL, INC., an
unknown business entity; MED ONE
CAPITAL FUNDING, LLC, an unknown
business; and DOES 1 through 100,
inclusive,

Defendants.

Case No. RG21095229

Honorable Brad Seligman
Department 22

CLASS ACTION

**DECLARATION OF OSCAR MORALES
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Tara Zabehi); Declaration of
Proposed Class Representative (Chumani
Brown); and [Proposed] Order filed
concurrently herewith]

Reservation ID: A-21095229-001
Date: October 22, 2024
Time: 3:00 p.m.
Department: 22

Complaint Filed: April 6, 2021
FAC Filed: January 23, 2023
SAC Filed: July 15, 2024
Trial Date: None Set

DECLARATION OF OSCAR MORALES

I, **Oscar Morales**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I am currently employed by Med One Group, Med One Capital, Inc., and Med One Capital Funding, LLC (“Med One” or “Defendants”) as an hourly-paid, non-exempt Biomed Technician. I began working for Med One as a driver in October 2021. I transitioned to my current job title in November 2023. I have always been an hourly-paid, non-exempt employee throughout my entire employment. I decided to seek legal advice about my work experiences with Med One and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Tara Zabehi. I wanted to do whatever I could to make sure Med One was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **3 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **5 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff, class representative and regarding the current status of the pending action against Med One.

3. I have spent over **4 hours** communicating with my attorneys regarding the case, my current job position with Med One, and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Med One, answering questions, preparing documents, and providing guidance regarding the duties of Med One employees, and helping develop a strategy as to what documents and information to obtain from Med One. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout the case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I

1 could. I spent at least **6 additional hours** speaking with my attorneys about the case, providing
2 my attorneys with documents and information concerning the case, and also describing policies,
3 practices, and procedures of Med One.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement agreement
6 and about **1 hour** asking questions and discussing the potential settlement with my attorneys before
7 signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the Class Members. I think
10 my efforts helped to get the result obtained in this case, and as a class representative, I respectfully
11 request that the Court award me an incentive payment in the amount of \$7,500.00 for my active
12 participation in this case. Taking into consideration the time that I have dedicated to this case, I
13 believe that this amount is reasonable.

14 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as an incentive payment, as well as my share of the settlement as a Class Member.

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

20 Executed this 08th day of September 2024, at Sacramento, California.

21 Electronically Signed 2024-09-29 23:39:25 UTC - 174.193.195.210
Oscar Morales
Nintex AssureSign® 871ee8bb-0e3d-404c-aad1-b1fa01840382

22 Oscar Morales