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Attorneys for Plaintiff

**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;

Plaintiff,

v.

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

Defendants.

Case No.: RG21095229

Honorable Jeffrey Brand
Department 22

CLASS ACTION

**DECLARATION OF CHUMANI BROWN
IN SUPPORT OF PLAINTIFF'S 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
(Annabel Blanchard); and [Proposed] Order
filed concurrently herewith]

Reservation ID: 247052013411
Date: October 12, 2023
Time: 2:00 p.m.
Department: 22

Complaint Filed: April 6, 2021
FAC Filed: January 23, 2023
Trial Date: August 19, 2024

DECLARATION OF CHUMANI BROWN

I, **Chumani Brown**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff 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 was employed by Med One Group, Med One Capital, Inc., and Med One Capital Funding, LLC (“Med One” or “Defendants”) as a salaried, exempt Customer Relations Specialist from approximately December 2019 to approximately October 2020. 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 Arby Aiwazian. 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 and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **7 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **6 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and PAGA representative.

3. I have spent over **14 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Med One, reviewing documents with my attorneys, answering questions, 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 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

1 them as quickly as possible and gave them as much information and identified as many
2 documents as I could. I spent at least **13 additional hours** speaking with my attorneys about
3 the case, identifying potential witnesses, providing my attorneys with documents and
4 information concerning the case, and also describing policies, practices, and procedures of Med
5 One.

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

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

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

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

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

24 Executed this 08/01/2023 day of 2023, at Vallejo, California.

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28 Chumani Brown