

Joanna Ghosh (SBN 272479)
Tara Zabehi (SBN 314706)
Connie Lee (SBN 357364)
LAWYERS for JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs and the Class

**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 Han Tran
Department 22

CLASS ACTION

**DECLARATION OF OSCAR MORALES
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT, CLASS
COUNSEL FEES AND COSTS, AND
INCENTIVE PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Class
Counsel Fees and Costs, and Incentive
Payments; Declaration of Class
Representative (Chumani Brown);
Declaration of Class Counsel (Tara Zabehi);
Declaration of Settlement Administrator
(Lindsay Romo); and [Proposed] Final
Approval Order and Judgment filed
concurrently herewith]

Reservation: 156888415351
Date: July 22, 2025
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

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

- 3
- 4
- 5

6
7
8
9
10
11
12
13
14
15
16
17
18
19

20
21
22
23
24
25
26

27
28

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 29th day of September 2024, at Sacramento, California.

21

Electronically Signed	2024-09-29 23:45:42 UTC - 174.193.195.210
Oscar Morales	
Nintex AssureSign®	6a8f8346b-5a59-40f2-9089-b1fa0186bf11

22 Oscar Morales