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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 CHUMANI
BROWN 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 (Oscar
Morales); 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

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1 could. I spent at least **14 additional hours** speaking with my attorneys about the case, identifying
2 potential witnesses, providing my attorneys with documents and information concerning the case,
3 and also describing policies, 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 **6.50 hours** reviewing the settlement
6 agreement and about **5.40 hours** asking questions and discussing the potential settlement with my
7 attorneys before 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, the
10 PAGA Members, and the State of California. I think my efforts helped to get the result obtained
11 in this case, and as a class and PAGA representative, I respectfully request that the Court award
12 me an incentive payment in the amount of \$7,500.00 for my active participation in this
13 case. Taking into consideration the time that I have dedicated to this case, I believe that this
14 amount is reasonable.

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

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

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

22 Executed this ²⁹th day of September 2024, at Vallejo, California.

23 Electronically Signed 2024-09-29 23:23:45 UTC - 146.75.154.137
Chumani Brown
Nintex AssureSign® 10e420bf-0da0-4bb6-8442-b1fa0180b0db

24 Chumani Brown