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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

ASHLEY BROWN, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

MINUTECLINIC DIAGNOSTIC MEDICAL
GROUP OF CALIFORNIA, INC., a
California Corporation; et al.;

Defendants.

Case No.: 30-2021-01185270-CU-OE-CXC
*[Assigned to Hon. Lon F. Hurwitz, Dept
CX103, for all purposes]*

**DECLARATION OF PLAINTIFF
ASHLEY BROWN IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Complaint filed: February 22, 2021

I, Ashley Brown, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of
all matters stated herein and could competently testify thereto.

2. I make this declaration in support of the motion for final approval of the class
action settlement. I believe that the settlement is fair and reasonable and constitutes a fair
resolution of the claims alleged.

3. During my employment with Defendant, I thought that there were issues with my pay
as well as my meal periods and rest breaks. I started researching California law and then
contacted my attorneys (Lauby, Mankin & Lauby LLP). In this process, I understood that I could

1 either bring a class action to help all employees, but I would have to put their interests ahead of
2 my own, or I could bring my individual claims and attempt to maximize my individual recovery.
3 This decision was very difficult – I wanted to help everyone that was wronged by the company,
4 but I also wanted maximize my individual recovery. I was also concerned that, if I brought this
5 as a class action, I might get labeled as a whistleblower, which might make it hard to find a job
6 in the future. I eventually decided that – despite the risks – it was important to bring these claims
7 as a class action to hold the company accountable for how they treated their employees.

8 4. I have spent substantial time and faced many risks and stressors bringing this
9 case. For instance, I have spent an estimated 50 hours engaged in activities to benefit the class,
10 such as: compiling and analyzing substantial documentation regarding claims; explaining and
11 discussing the company's practices and their general practices and procedures; locating and
12 analyzing company documents, among others. I also assisted in settlement discussions, helped
13 obtain a highly favorable result for the class, and reviewed all settlement documents and believe
14 that this settlement is fair for the class. I also undertook significant risks and stresses at a high
15 emotional cost without any guarantee of success. For example, filing this lawsuit and being a
16 whistle blower was stressful on a day-to-day basis as I have constantly worried about the risk
17 that this case could impact my ability to find future jobs.

18 5. Therefore, I respectfully request that the Court approve this class action
19 settlement as fair and reasonable because it provides substantial benefits to the class members.

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 on Apr 19, 2023 (date), at Eastvale (city), California.

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24 By: 
25 Ashley Brown
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