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Attorneys for Plaintiff

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

SAMUEL ELLIOTT, 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,

vs.

MED-DATA, INCORPORATED, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: RIC1901865

Honorable Sunshine S. Sykes
Department 6

CLASS ACTION

**DECLARATION OF SAMUEL ELLIOTT
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 (Edwin
Aiwaazian); Declaration of Proposed
Administrator (Eric Springer); Declaration of
Proposed Cy Pres Recipient (Heather Tiffiee);
Compliance Chart; and [Proposed] Order filed
concurrently herewith]

Reservation: 006997607479
Date: December 1, 2021
Time: 8:30 a.m.
Department: 6

Complaint Filed: March 13, 2019
FAC Filed: September 9, 2021
Trial Date: None Set

DECLARATION OF SAMUEL ELLIOT

I, **Samuel Elliot**, 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 Defendant Med-Data, Incorporated ("Med-Data") in an hourly-paid, non-exempt position from approximately March 2017 to October 2017. I decided to seek legal advice about my work experiences with Med-Data and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Med-Data paid me and other employees what was owed to us for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 10 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 8 hours to discuss 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, eventually, a PAGA representative.

3. I have spent over 20 hours meeting and communicating with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents concerning my employment with Med-Data, reviewing documents with my attorneys, answering their questions, providing guidance regarding the work performed by non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Med-Data. I frequently checked in with my attorneys and their staff to make sure that they had my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with them whenever they needed me. I responded to my attorneys as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least 16 additional hours speaking with my attorneys about the

case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Med-Data.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 4 hours reviewing the settlement documents and about 3 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement papers.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class and proposed PAGA representative, I respectfully request that the Court award me an enhancement award in the amount of \$10,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

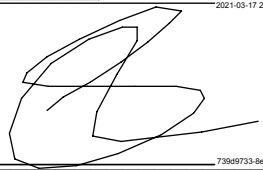
7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement fund as a class member.

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

Executed on March 17, 2021, at Temecula, California.

Electronically Signed
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Samuel Elliot