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Attorneys for Plaintiff and the Aggrieved Employees

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF SAN MATEO

DENISE WILLIAMS, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

ADVANCED CLINICAL LLC, an Illinois
limited liability company; ADVANCED
RESOURCES, L.L.C., a California limited
liability company; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 21-CIV-03494

*(Assigned to the Honorable Nancy L. Fineman,
Dept. 4, for all purposes)*

**DECLARATION OF DENISE WILLIAMS
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

Date: April 1, 2025
Time: 2:00 p.m.
Place: Dept. 4

FAC Filed: August 13, 2021
Jury Trial Date: None set

1 I, Denise Williams, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-
3 reference action. I have personal knowledge of the facts set forth below, except as to those matters
4 stated on information and belief and, as to those matters, I believe them to be true. If called as a
5 witness, I could testify competently as to the matters stated in this declaration.

6 2. I was employed by Defendant Advanced Clinical LLC ("Defendant") as a medical
7 technician from in or about September 2020 to on or about March 15, 2021. Throughout my
8 employment with Defendant, I was a non-exempt employee.

9 3. During my employment with Defendant, I regularly worked shifts that lasted 3.5
10 hours or more but were not provided with compliant, off-duty rest breaks. Specifically, due to a
11 lack of staffing, I was routinely denied my rest breaks and had to continue working. I was not
12 paid any premiums for the missed rest breaks.

13 4. During my employment with Defendant, I was required to use my personal cell
14 phone for work, including to download a mobile application, communicate with coworkers, check
15 e-mails, and keep track of work hours. I was not reimbursed for the costs incurred with work-
16 related use on my personal cell phone.

17 5. During my employment with Defendant, I believe I was not provided with accurate
18 wage statements.

19 6. I understand that the claims alleged in this action were brought on a representative
20 basis on behalf of other aggrieved employees of Defendant. I do not believe I have any interests
21 that are adverse to the other employees that are part of the PAGA settlement.

22 7. I have spent a significant amount of time discussing this matter with my attorneys
23 on many occasions and explaining my understanding of Defendant's practices. To date, I have
24 performed a number of tasks in my role as the representative. This includes discussing this case
25 and the facts involved with my attorneys; searching for and providing documents pertaining to
26 the case; reviewing the files and pleadings, including my paystubs/payroll documents, the PAGA
27 letter, the complaint, and the Settlement Agreement; responding to any questions from my
28 attorneys regarding Defendant's practices; remain available during mediation; and regularly

1 providing information to my attorneys. In total, I estimate that I have spent roughly 35 hours in
2 connection with the prosecution of this lawsuit.

3 8. I have discussed the terms of the Settlement Agreement with my attorneys, and
4 based on the information provided, I believe the settlement to be fair, reasonable, and adequate
5 for myself and for all other employees who worked for Defendant.

6 9. I believe many employees would not sue their employer out of fear. I took on risks
7 by bringing this lawsuit, and I understand that the State and others will benefit because of the
8 actions that I have taken. I feel that it is a positive accomplishment, am proud of the result, and
9 believe that the settlement is fair, adequate, and reasonable.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct. Executed on November 12, 2024, at _____,
12 California.

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15 _____
Denise Williams
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