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Attorneys for Plaintiff

Electronically FILED by
 Superior Court of California,
 County of Los Angeles
 9/26/2023 3:38 PM
 David W. Slayton,
 Executive Officer/Clerk of Court,
 By J. Covarrubias, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

MARISELA MEZA, individually, and on
 behalf of all others similarly situated,

Plaintiffs,

v.

ARGUS MANAGEMENT COMPANY, LLC, a
 California Limited Liability Company;
 PROHEALTH PARTNERS, A MEDICAL
 GROUP, INC., a California corporation; and
 DOES 1 through 10, inclusive,

Defendants.

Case No. 21STCV31612

CLASS ACTION

[Assigned for all purposes to: Hon. Yvette M.
 Palazuelos, Dept. 9]

**DECLARATION OF MARISELA MEZA
 IN SUPPORT OF PLAINTIFF'S
 MOTION FOR PRELIMINARY
 APPROVAL OF CLASS ACTION
 SETTLEMENT**

PRELIMINARY APPROVAL HEARING

Date: November 21, 2023

Time: 10:00 a.m.

Dept: 9

Complaint filed: August 26, 2021

Trial date: Not set

DECLARATION OF MARISELA MEZA

I, Marisela Meza, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am the named Plaintiff in this action and submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement. Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request of a \$10,000 service payment for my role as the Class Representative.

3. I am a former employee of Defendants Argus Management Company, LLC and ProHealth Partners ("Defendants"). I worked for Defendants from approximately February 2020 to approximately December 2020 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject Defendants' policies and practices that have been alleged as unlawful in the Class Action and PAGA Settlement Complaint.

4. I joined this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks. While working for Defendants, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks and without receiving compensation for all hours worked. I also observed my co-workers working long hours without taking breaks.

5. By joining this lawsuit, I hoped that I might be able to change Defendants' policies to better protect the working conditions of my co-workers. I also understood it was my duty as the Class Representative to represent the best interests of the class, know about the lawsuit, help my attorneys, and keep updated on the case.

6. Prior to joining this case, I provided Wilshire Law Firm with a detailed account of the facts related to my employment with Defendants. Additionally, I provided my counsel with documentation in the form of pay statements and other policy documents that applied to my employment with Defendants. Based on my conversations, my attorneys and I were able to identify instances when I was not paid correctly.

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1 7. I regularly communicated with my attorneys and their staff to discuss updates on
2 the case and to provide my attorneys with additional information.

3 8. I spent multiple hours looking for documents that my attorneys asked me to
4 provide to help this case.

5 9. I also made myself available during the mediation for this case and I kept in
6 regular contact with my attorneys before and after the mediation to ensure that any questions the
7 attorneys had could be answered.

8 10. I also reviewed documents filed in this case, including the settlement-related
9 documents.

10 11. I believe the settlement is a good settlement and I would recommend that the
11 Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad
12 that I had the opportunity to represent the class in this lawsuit and that I was able to recover
13 money through a settlement for the class. I have also observed my attorneys' work throughout
14 this case and I believe they have been thorough, diligent, prompt, courteous, and professional.

15 12. I estimate that I spent **at least 60 hours on this case** since I first contacted
16 Wilshire Law Firm.

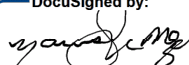
17 13. I did not make the decision to join this case lightly. I was concerned by the
18 attention a lawsuit, and especially a class action, would attract. My name would be associated
19 with a lawsuit that I filed against my former employer and I am mindful that future employers
20 might find out that I sued a former employer, which could hurt my employability. In a
21 competitive job market, this factor may weigh heavily against me.

22 14. I respectfully request that the Court award me at least a \$10,000 service payment
23 as allowed in the Settlement Agreement. I am receiving no additional compensation other than
24 the service payment and the other compensation provided for in the settlement. Based on my
25 involvement in this case and the benefits provided to my former co-workers, I can say I helped
26 represent the other workers who may have been too afraid to come forward as a plaintiff in this
27 lawsuit. I was not afraid to take that risk because I strongly care about helping my fellow co-
28

workers and I wanted to make sure that other employees could get monetary recovery from the case.

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

Executed on 9/21/2023 at Las Vegas, Nevada.

DocuSigned by:

4FFC005B809E453...
Marisela Meza

WILSHIRE LAW FIRM, PLC
3055 Wilshire Blvd, 12th Floor
Los Angeles, CA 90010-1137

PROOF OF SERVICE

Meza v. Argus Management Company, LLC, et al.
21STCV31612

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Min Jee Kim, am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to this action. My business address is 3055 Wilshire Blvd., 12th Fl., Los Angeles, California 90010. My electronic service address is minjee@wilshirelawfirm.com.

On September 26, 2023, I served the foregoing **DECLARATION OF MARISELA MEZA IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

Ian Chuang, Bar No. 277276
ianchuang@maddenjones.com
MADDEN, JONES, COLE & JOHNSON
3010 Old Ranch Parkway, Suite 450
Seal Beach, California 90740
Telephone: (949) 441-4495
Facsimile: (949) 783-5181

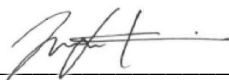
Attorneys for Defendants

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site.

(X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service **CASEANYWHERE**.

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

Executed this **September 26, 2023**, at Los Angeles, California.



Min Jee Kim