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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 FINAL APPROVAL OF CLASS
 ACTION SETTLEMENT**

FINAL APPROVAL HEARING

Date: May 2, 2024

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 Final Approval of Class Action Settlement. This declaration supplements the declaration I previously submitted to this Court on September 25, 2023.

3. 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.

4. 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.

5. I commenced 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.

6. I filed this lawsuit in August 2021 with the goal that I might be able to change Defendants' policies to better protect the working conditions of my co-workers. I also filed this lawsuit to collect unpaid money that was owed not just to me but also to other employees that worked for Defendants. I understood it was my duty as a Class Representative to represent the best interests of the other employees, know about the lawsuit, help my attorneys, and keep updated on the case.

7. By filing this case as a class action, I understood that I would be bringing claims

1 on behalf of myself and other employees.

2 8. I also understood that class actions take longer to resolve than individual actions,
3 and I therefore took the risk in delaying any potential recovery to me that would have been faster
4 to obtain if I pursued this case on an individual basis. This case was filed in August 2021, almost
5 three years ago. During this time, I had to borrow money from my family to cover mortgage
6 payments and day-to-day living expenses, including gas, utilities, and food. Even though I could
7 have sought quicker recovery on an individual basis only, I chose to pursue the claims through
8 this class action to benefit other members of the class. I am relieved that this case is coming to
9 an end so that other employees and myself can be compensated.

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

15 10. I regularly communicated with my attorneys and their staff to discuss updates on
16 the case and to provide my attorneys with additional information. These regular communications
17 have amounted to more than 25 hours of my time on this case.

18 11. I also spent at least five hours looking for documents that my attorneys asked me
19 to provide to help this case.

20 12. I also made myself available during the mediation for this case, which lasted more
21 than 8 hours, and I kept in regular contact with my attorneys before and after the mediation to
22 ensure that any questions the attorneys had could be answered.

23 13. I also reviewed documents filed in this case, including the settlement-related
24 documents. My time spent reviewing documents in this case is more than 15 hours.

25 14. I believe the settlement is a good settlement and I would recommend that the
26 Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad
27 that I had the opportunity to represent the class in this lawsuit and that I was able to recover
28 money through a settlement for the class. I have also observed my attorneys' work throughout

1 this case and I believe they have been thorough, diligent, prompt, courteous, and professional.

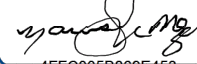
2 15. I estimate that I spent **at least 60 hours on this case** since I first contacted
3 Wilshire Law Firm in early 2021.

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

9 17. I respectfully request that the Court award me at least a \$10,000 service payment
10 as allowed in the Settlement Agreement. I am receiving no additional compensation other than
11 the service payment and the other compensation provided for in the settlement. Based on my
12 involvement in this case and the benefits provided to my former co-workers, I can say I helped
13 represent the other workers who may have been too afraid to come forward as a plaintiff in this
14 lawsuit. I was not afraid to take that risk because I strongly care about helping my fellow co-
15 workers and I wanted to make sure that other employees could get monetary recovery from the
16 case.

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

19 Executed on 4/2/2024 at Las Vegas, Nevada.

20 DocuSigned by:
21 
22 4FFC005B889E453...
23 Marisela Meza
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PROOF OF SERVICE

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

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Jorge Grimaldy, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12th Floor, Los Angeles, California 90010. My electronic service address is jgrimaldy@wilshirelawfirm.com.

On April 2, 2024, I served the foregoing **DECLARATION OF MARISELA MEZA IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL 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:

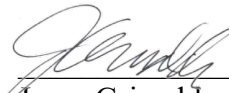
Ian Chuang
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Attorneys for Defendant

(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 E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

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

Executed on April 2, 2024, at Los Angeles, California.



Jorge Grimaldy