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7 DMA CLAIMS, INC., DMA CLAIMS
MANAGEMENT, INC., VENBROOK GROUP,
8 LLC, and VENBROOK INSURANCE
SERVICES, LLC
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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES – SPRING STRET COURTHOUSE

13 GENNINE MERRITT, individually, and on a
14 representative basis, and on behalf of others
all similarly situated,

15 Plaintiff,

16 vs.

17 DMA CLAIMS, INC.; a California
18 Corporation; DMA CLAIMS
MANAGEMENT, INC.; an Illinois
19 Corporation; VENBROOK GROUP, LLC; a
Delaware Limited Liability Company; and
20 VENBROOK INSURANCE SERVICES,
LLC, a California Limited Liability Company;
21 and DOES 1 through 20, inclusive;

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23 Defendants.
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Case No.: 21STCV31200

[Assigned for all purposes to the Hon. Stuart
Rice, Dept. 1]

CLASS ACTION

**DECLARATION OF DEFENDANTS'
REPRESENTATIVE CHARLES N. OHL
IN SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: December 12, 2022
Time: 10:00 a.m.
Dept: 1

Complaint Filed: August 24, 2021
Trial Date: None.

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2 **DECLARATION OF CHARLES N. OHL**

3 I, Charles N. Ohl, declare:

4 1. I am a citizen of the United States and am over the age of 18. I make this
5 declaration in connection with Plaintiff's Motion for Preliminary Approval of Class Action
6 Settlement. I am Defendants' general counsel. I have personal knowledge of the facts attested to
7 below.

8 2. I was responsible for overseeing the preparation of the Class and PAGA
9 Aggrieved Employee list. During the Class Period of August 23, 2017 to September 29, 2022,
10 our employment records identified 185 Class Members who worked approximately 10,900 pay
11 periods. During the shorter PAGA Period, from August 23, 2020 to September 29, 2022, there
12 were approximately 82 Aggrieved Employees who worked approximately 3500 pay periods.

13 3. I know of no other lawsuits with claims against Defendants that potentially
14 overlap with the wage and hour claims that are being settled in this lawsuit.

15 4. Defendants have no financial interest in or any ties to the proposed class
16 administrator Phoenix Class Action administration. We understand from counsel that Phoenix is
17 one of several class notice administrators that are used in wage and hour cases like this one.

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

20 Executed this 16th day of November, 2022 at Valenica, California.

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23 Charles N. Ohl
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