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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

MATTHEW SAVATTIERI, on behalf of himself
and all others similarly situated;

Plaintiff,

vs.

AMI EXPEDITIONARY HEALTHCARE, LLC, a
Delaware limited liability company; AMI
EXPEDITIONARY HEALTHCARE (USA), LLC,
a Wyoming limited liability company; and DOES 1
through 25, inclusive.

Defendants.

SHORNIKAY CALLUM, an Individual, on
behalf of herself and all others similarly situated

Plaintiffs,

vs.

Lead Case No.: 21STCV33372

[Consolidated with Case Nos. 21STCV45611
and 21STCV46752]

*Assigned to the Hon. Kenneth R. Freeman,
Department 14*

**DECLARATION OF PLAINTIFF
MATTHEW SAVATTIERI IN SUPPORT
OF PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: March 19, 2024
Time: 11:00 a.m.
Department: 14

Complaint Filed: September 10, 2021
Trial Date: Not Set

1 AMI EXPEDITIONARY HEALTHCARE (USA),
2 LLC, a Wyoming Limited Liability Company;
3 AMI EXPEDITIONARY
4 HEALTHCARE, LLC, a Delaware Limited
Liability Company and DOES 1 through 100,
Inclusive

5 Defendants

6 ASHLEY CHARLEMAGNE, BRIANA
7 HUGUELY, MARLA LEWIS, and SHARON
8 LEWIS, on behalf of themselves and others
similarly situated

9 Plaintiffs,

10 vs.

11 AMI EXPEDITIONARY HEALTHCARE (USA),
12 LLC, a Wyoming limited liability company; AMI
13 EXPEDITIONARY HEALTHCARE, LLC, a
14 Delaware limited liability company; AMI
15 HEALTH, a business entity of unknown form; AMI
16 EXPEDITIONARY HEALTHCARE, a business
entity of unknown form; and DOES 1 through 50,
Inclusive

17 Defendants.

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24 SHORNIKAY CALLUM, individually and on behalf of all others
similarly situated

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9 Attorneys for Plaintiffs
10 ASHLEY CHARLEMAGNE,
11 BRIANNA HUGUELY, MARIA LEWIS,
12 and SHARON LEWIS on behalf of themselves and others similarly situated
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DECLARATION OF MATTHEW SAVATTIERI

I, Matthew Savattieri, declare and state as follows:

1. I am over the age of eighteen (18) and I am a resident of the State of New York. 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 Defendants AMI Expeditionary Healthcare, LLC and AMI Expeditionary Healthcare (USA), LLC (together, “Defendants” or “AMI”) from approximately May 2021 to November 2021 as an hourly-paid, non-exempt Cluster Lead within the Los Angeles Unified School District. As a Cluster Lead, I was responsible for supervising a “cluster” of AMI employees consisting of logisticians, administrators, and collectors. My day-to-day tasks included, but were not limited to, obtaining supplies and materials, transporting employees to and from AMI’s sponsored hotels and worksites, setting up testing sites, performing COVID-19 tests, overseeing testing procedures, maintaining AMI’s company vehicles, and communicating with AMI’s management regarding site operations.

3. I believed that Defendants were violating the California Labor Code by not paying their nonexempt employees all wages due for all hours worked and for failing to provide employees with lawfully compliant meal and rest breaks. In addition to those wage claims, I also believed that Defendants had retaliated against me and wrongfully terminated my employment because I had brought my concerns to their attention seeking redress. Specifically, not too long after I began working for Defendants, I believed that I and other employees were not being permitted to take all lawful rest and meal breaks to which we were entitled under California law, and I believed that hours which I and others worked were deleted from our timesheets, resulting in us not being paid for hours we had worked.

4. I complained about these practices to my supervisor, but that resulted in my supervisor claiming that I was not doing my job correctly and placing me on a Performance Improvement Plan. I complained to Defendants’ Human Resources department but received no response. My supervisor continued to write me up for alleged performance deficiencies, culminating in my termination. Finally, I submitted my allegations to the labor board and in support thereof, I provided a petition for which I had obtained almost 300 signatures from other employees.

1 5. I decided to seek legal advice about my work experiences at AMI and about filing a lawsuit
2 to seek to redress my grievances. I contacted Blackstone Law, APC and spoke with the attorneys there.
3 After speaking with the attorneys, I investigated class and representative action lawsuits on my own.
4 Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class
5 actions, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it
6 meant to bring a class and PAGA action.

7 6. Even though I believed that I had been retaliated against for complaining about alleged
8 wage and hour violations to Defendants, after speaking with my attorneys, I decided to focus on bringing
9 the claims for wage violations on behalf of all nonexempt employees to make sure Defendants were held
10 accountable for what I believed were serious wage violations.

11 7. I have regularly conferred with my attorneys regarding the case and fulfilling my
12 responsibilities as a class action and PAGA representative, which has included providing documents
13 concerning my employment with Defendants, reviewing documents with my attorneys and answering
14 their questions, providing information and guidance regarding the duties of other non-exempt employees,
15 and helping develop a strategy as to what documents and information to obtain from Defendants. I
16 routinely checked in with my attorneys and their staff to make sure that they had all of my most current
17 information and any additional information that I had obtained.

18 8. Throughout my involvement in this matter, I was available to answer any questions my
19 attorneys had and was available to speak and meet with my attorneys whenever they needed me. I
20 responded to them as quickly as possible and gave them as much information as I could. I described the
21 policies, practices, and procedures of Defendants. I contacted and referred several potential witnesses
22 and potential class members to my attorneys. I also communicated with my attorneys and assisted their
23 efforts to prepare for mediation.

24 9. I understood that in the event this matter did not settle and proceeded with trial, I would
25 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
26 responsibilities that are necessary for this matter.

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1 10. Following the mediation, I reviewed the settlement agreement. I discussed the settlement
2 agreement with my attorneys and asked them questions before I signed it. I believe the settlement
3 obtained is fair and reasonable based on the facts and claims, and the risks involved in continuing to
4 litigate this matter, as I understand them.

5 11. I believe that I have done everything that my attorneys have asked of me and tried, to the
6 best of my ability, to seek relief for the Class, the Aggrieved Employees, and the State of California. In
7 total, I have spent approximately 25 to 30 hours participating in this matter as described above. I think
8 my efforts helped to get the result obtained in this matter. I believe I fulfilled my duties as a Class and
9 PAGA representative and put the interests of the Class and other Aggrieved Employees ahead of my own.

10 12. I also believe that my interests have been and continue to be aligned with the Class and
11 Aggrieved Employees, and I have been and continue to be willing to vigorously pursue the claims on the
12 collective behalf of all Class Members and Aggrieved Employees. Consequently, I do not believe that I
13 have any interests that are adverse to the interests of the Class and Aggrieved Employees.

14 13. I understand that any resolution of this matter on a class-wide basis is subject to court
15 approval, and any settlement must be designed in the best interest of the Class as a whole. I have at all
16 times throughout the course of this litigation considered the interest of the Class.

17 14. I respectfully request that the Court approve and award me a service payment in the
18 amount of \$10,000.00 for my efforts and active participation in this matter and for giving a general release
19 of all claims pursuant to California Civil Code section 1542. Taking into consideration that I gave up
20 pursuing potential individual claims I believe I had in connection with how Defendants treated me when
21 I was employed there, plus the time that I dedicated to this matter, I believe that this amount is reasonable.
22 I affirm that I have not received any other consideration or promises for any other consideration.

23 15. Last, I believe that the requested service payment is fair given the risks that I have
24 willingly taken in bringing this case against my former employers. Given the ease of access to
25 information on the internet, the risk of stigma and future retaliation against me due to my role in this
26 litigation is very real. I chose to accept that risk that my participation in this matter may negatively affect
27 future employment in this industry, or even other industries that I may choose to pursue.

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16. I am not related to anyone associated with Blackstone Law, APC, David Yermian & Associates, Inc., D.Law, Inc., or Kokozyan Law Firm, APC.

17. I understand that Blackstone Law, APC, David Yeremian & Associates, Inc., and Kokozyan Law Firm, APC will share the attorney fees in this matter. I agreed to this in writing. I understand that the amount of attorneys' fees will not increase as a result of this fee sharing.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on 01/25/2024, at Brooklyn, New York.


Matthew Savattieri