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BRIANA HUGUELY, MARLA LEWIS, and
SHARON LEWIS, on behalf of themselves and others

[Additional counsel listed on next page]

**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.

Lead Case No.: 21STCV33372

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

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

**DECLARATION OF DAVID YEREMIAN
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

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

Plaintiffs,

vs.

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

Defendants

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

Plaintiffs,

vs.

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

Defendants.

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

DECLARATION OF DAVID YEREMIAN

I, David Yeremian, declare:

1. I am an attorney licensed and admitted to practice before all courts of the State of California, the United States District Court for the Central, Southern, Eastern, and Northern Districts of California, and the Ninth Circuit Court of Appeals.

2. I am the managing attorney of David Yeremian & Associates, Inc., counsel for Plaintiffs Ashley Charlemagne, Briana Huguely, Marla Lewis, and Sharon Lewis ("Plaintiffs" or "Class Representatives") on behalf of similarly situated employees of AMI Expeditionary Healthcare, LLC; AMI Expeditionary Healthcare (USA), LLC; and AMI Extraordinary Healthcare (together, "Defendants" or "AMI"). I and my firm are referred to herein as Class Counsel. I have personal knowledge of the facts herein and if called as a witness, I could and would competently testify.

3. All of the matters set forth herein are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true. I have represented Plaintiffs and the putative Class since the inception of this matter. I submit this Declaration in support of the Motion for Final Approval, filed by Plaintiffs, on behalf of themselves and other similarly situated employees of Defendants and without opposition from Defendants.

4. My firm is well qualified because of our experience, knowledge, and resources to act as counsel and represent Plaintiffs and the putative class in this action. My practice is exclusively focused on employment matters, with a substantial percentage devoted to litigating wage, hour, and working-conditions violations on a class-wide basis.

5. I graduated from UC Berkeley in 1997 and received my law degree and MBA from UCLA in 2001. I am a member of the Los Angeles County Bar Association and the California Employment Lawyers Association. I have been honored as a Super Lawyers Rising Star in 2009, 2010, 2012-2015. I have been named honored as a Super Lawyer since 2016.

6. I have been practicing law since 2003. Since 2007, I have focused almost exclusively on representing employees, including in wage-and-hour class actions. During my career I have represented employees in over 100 wage-and-hour class action lawsuits as lead or co-lead counsel (including in the Central, Southern, Eastern and Northern Districts of California), and I have obtained six and seven

1 figure settlements against a range of defendants, including Fortune 500 companies. These cases have
2 involved the gamut of wage-and-hour claims, including claims for failure to pay minimum wages,
3 unpaid wages and overtime, failure to provide meal and rest breaks, failure to reimburse necessary
4 business expenses, inaccurate pay statements, failure to pay timely wages—similar to claims at issue in
5 the present matter.

6 7. I am experienced in prosecuting employment matters, particularly class actions. In addition to
7 the present case, I am also class counsel for dozens of other putative wage-and-hour class-action
8 lawsuits pending in various state and federal jurisdictions throughout California.

9 8. My extensive experience in litigating employment wage and hour matters has been integral in
10 identifying legal issues, evaluating the strengths and weaknesses of a case, and generally negotiating fair
11 and reasonable class action settlements. Practice in the narrow field of wage and hour litigation requires
12 skill and knowledge concerning the constantly evolving substantive law (state and federal), as well as
13 the procedural law of class action litigation. In this action, I am fully equipped to use the skills and
14 knowledge I have developed through more than a decade of prosecuting and defending wage and hour
15 class actions to fairly and adequately represent the interests of the Class. Therefore, on the account of
16 my resources, experience, and knowledge, I am well qualified to act as class counsel and represent
17 Plaintiffs and the putative Class Members in this action.

18 9. In the last several years I have had several contested class cases certified including in
19 *Espinoza v. Phoenix Warehouse of California, LLC, et al.*, LASC Case No. BC503678, certification
20 granted July 17, 2017; and *Evans v. Redhill Towing & Auto Repair, Inc., et al.*, Marin County Superior
21 Court Case No. CIV 1205074, certification granted July 23, 2014. We have also recently briefed
22 certification motions in *Trevino, et al. v. Golden State FC, LLC, Amazon.com, LLC, et al.*, Eastern
23 District of California Case No. 18CV-00120 and *Piana, et al. v. Loandepot.com, LLC*, Orange County
24 Superior Court Case No. 30-2017-00913164. The *Trevino* motion is pending and the *Piana* matter
25 settled shortly after certification briefing. Owing to my experience, I am well qualified to evaluate the
26 class claims in this action, to evaluate settlement v. trial and defenses raised. I have negotiated over 100
27 class action settlements, including many involving the same issues presented in this case. A selection of
28 cases wherein I have served as lead or co-lead class counsel includes: *Galavis v. Patina Restaurant*

1 *Group, LLC* (LASC BC375225; class size approx. 10,000; co-lead counsel); *Milford v. ADT Security*
2 *Services, Inc.* (CACD CV08-2236; class size approx. 2,000; lead counsel); *Carreon v. Wolfgang Puck*
3 *Catering and Events, LLC* (LASC BC398569; class size approx. 1,400; lead counsel); *Fluke v. RFG Oil,*
4 *Inc.* (LASC BC403354; class size approx. 1,400; lead counsel); *Urena v. Camachos Restaurant* (LASC
5 BC365913; class size approx. 887; lead counsel); *Smith v. Rio Rancho Pontiac GMC Buick Inc.* (LASC
6 BC391187; class size approx. 860; lead counsel); *Callela v. Dolce Group* (LASC BC364711; class size
7 approx. 600; lead counsel); *Vasquez v. The Hollywood Pig n Whistle LP* (LASC BC335075; class size
8 approx. 600; lead counsel); *Goldman v. Aorta Restaurant Operating LP* (LASC BC379688; class size
9 approx. 300; lead counsel); *Sink-Crilly v. Centex Homes* (CACD CV09-2476; class size approx. 250;
10 lead counsel); *Utley v. Cranbrook Partners Inc.* (LASC BC392813; class size approx. 200; lead
11 counsel); *Garcia v. California Credits Group* (LASC BC353213; class size approx. 160; lead counsel);
12 *Afanasyev v. Miller Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead counsel); *Morris v.*
13 *Gymboree, Inc.* (LASC BC393270; class size approx. 150; lead counsel); *Ortega v. AJC Sandblasting,*
14 *Inc.* (LASC BC378806; class size approx. 140; lead counsel); *Lulejyan v. Jim Falk Motors of Beverly*
15 *Hills, Inc.* (LASC BC398459; class size approx. 72; lead counsel); *Rylko v. The Griddle Café, Inc.*
16 (LASC BC386126; class size approx. 70; lead counsel); *Healy v. Siemens IT Solutions and Services, Inc.*
17 (Santa Clara Superior Court 108CV113479; class size approx 60; lead counsel).

18 10. My firm took this case on a contingent-fee basis against a business represented by a reputable
19 defense firm. When we take contingent cases, we must pay careful attention to the economics involved
20 or one bad case can destroy years of work. Accordingly, when we take contingency cases, we anticipate
21 that we shall, if successful, receive a fee that exceeds our normal hourly rate; otherwise, the risk is often
22 too great to bear. Even when we work long hours, the number of hours in a day is limited. Because of
23 this, when we take on one particular matter, we are unable to take on other matters. When Class Counsel
24 became involved in this case, we realized the time commitment that it would entail and we were forced
25 to turn down matters that we otherwise should have been able to handle. In sum, this case claimed a
26 significant portion of Class Counsel's time and attention throughout its pendency

27 11. As co-counsel for Plaintiffs and the proposed Settlement Class, I have been intimately
28 involved in every aspect of this case and believe that the proposed Settlement is fair, reasonable and

adequate and in the best interests of the Settlement Class

12. Class Counsel's lodestar calculation supports the request attorneys' fees. Class Counsel charges rates commensurate with the prevailing market rates in the Los Angeles area for attorneys of comparable experience and skill handling complex litigation. Class Counsel conservatively estimates that it invested over 64 hours of attorney time in this matter. David Yeremian's billing rate is \$800 per hour (21 years out of law school and is less than the Laffey Matrix rate of \$829.00), and he spent approximately 15 hours on this matter. Roman Shkodnik's billing rate is \$650 (12 years out of law school, Laffey Matrix rate of \$1,057), and he spent approximately 49 hours on this matter. The lodestar for Plaintiffs' counsel is \$43,850 (\$12,000 for David Yeremian's time on the case and \$31,850 for Roman Shkodnik's time on the case).

13. As of the date of the filing of the instant motion, my firm has costs of \$3,293.97. See Class Counsel's Cost Log attached hereto and incorporated herein as **Exhibit "1."** Class Counsel incurred costs including, but not limited to, filing fees (e.g. complaint, stipulation, motions), service of process, travel costs, attorney-service costs for court filings, copy charges for documents, parking, and postage charges.

Executed this 6th day of February, 2024 at Glendale, California.



David Yeremian

EXHIBIT 1

Savattieri v. AMI Expeditionary Healthcare, LLC

Costs Ledger

Settlement Memo	Party	Provider	Date	Total Amount
Summons * Complaint	Charlemagne, Ashley	Rapid Legal	12/22/2021	1,498.36
PAGA Letter	Charlemagne, Ashley	LWDA	12/22/2021	75.00
Process of Service - S&C to All Defendants	Charlemagne, Ashley	Rapid Legal	12/30/2021	309.76
Process of Service - FAC to All Defendants	Charlemagne, Ashley	Rapid Legal	03/04/2022	242.65
Proof of Service of S&C - All Defendants	Charlemagne, Ashley	Rapid Legal	01/21/2022	16.73
Proof of Service of FAC - All Defendants	Charlemagne, Ashley	Rapid Legal	03/28/2022	16.73
Access Fee & Document Service Fee	Charlemagne, Ashley	Case Anywhere LLC	02/07/2024	850.00
Notice of Related Case; FAC + Courtesy Copy	Charlemagne, Ashley	Rapid Legal	03/14/2022	109.66
Notice of Change of Address + Courtesy Copy	Charlemagne, Ashley	Rapid Legal	04/28/2022	78.68
Joint Status Conference Report + Courtesy Copy	Charlemagne, Ashley	Rapid Legal	05/26/2022	78.68
Association of Attorney	Charlemagne, Ashley	Rapid Legal	09/21/2023	17.72

Total: \$ 3,293.97