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Attorneys for Plaintiffs
 Matthew Savattieri, individually and on behalf of all others
 similarly situated

[Additional counsel listed on next page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE 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.

AMI EXPEDITIONARY HEALTHCARE
 (USA), LLC, a Wyoming Limited Liability

CASE NO.: 21STCV33372

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

[Assigned for all purposes to Hon. Kenneth R.
 Freeman Department 14]

CLASS ACTION

**DECLARATION OF SHORNIKAY
 CALLUM IN SUPPORT OF PLAINTIFFS'
 MOTION FOR PRELIMINARY
 APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: March 16, 2023
 Time: 10:00 a.m.
 Department: 14

Complaint Filed: September 10, 2021
 Trial Date: None Set

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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10 Attorneys for Plaintiffs
11 ASHLEY CHARLEMAGNE,
BRIANNA HUGUELY, MARIA LEWIS,
and SHARON LEWIS on behalf of themselves and others similarly situated

12 **DECLARATION OF SHORNIKAY CALLUM IN SUPPORT OF PLAINTIFFS'**

13 **MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

14 I, SHORNIKAY CALLUM, declare:

15 1. I am an adult over the age of eighteen (18) years old. I am the Class Representative
16 who filed one of the lawsuits on behalf of the class which is the subject of this action. This
17 declaration is based on my personal knowledge, and if called as a witness, I would and could
18 competently testify to these facts.

19 2. I worked for Defendants AMI EXPEDITIONARY HEALTHCARE (USA), LLC
20 and AMI EXPEDITIONARY HEALTHCARE, LLC ("Defendants" and/or the "Company") as a
21 non-exempt, hourly employee during the Class Period and worked under the same policies and
22 procedures and suffered the same violations as all other putative class members.

23 3. I am familiar with the work involved in prosecuting this Class Action against my
24 former employers. I have had numerous in-person and telephonic meetings with my attorneys at
25 Kokozyan Law Firm, APC. I am familiar with the client meetings, informal discovery conducted,
26 and settlement discussions.

27 4. I participated actively in this litigation including informal discovery meetings,
28 witness information discussions, and have participated in all other stages of the litigation including

1 preliminary approval of class action settlement on behalf of the Class.

2 5. I believe that the Class Action Settlement obtained on behalf of the Class is
3 excellent in view of the issues and risks involved with the case.

4 6. It is my opinion that a fair and adequate Class Representatives Service Payment for
5 myself is Five Thousand Dollars (\$5,000). I believe that is fair and reasonable in view of all the
6 work which I have performed as a Class Representative.

7 7. I estimate that I have spent approximately over thirty-five (35) hours dealing with
8 these issues on my own and in consultation with Class Counsel regarding the issues raised in the
9 action. I have remained in contact with my attorneys throughout the litigation and the settlement
10 process. I provided all of the documents in my possession, reviewed numerous pages of
11 documents produced by Defendants. I believe I have been diligent and acted above and beyond
12 that which is expected of a Class Representative throughout all stages of the litigation, up to and
13 including preliminary approval of class action settlement. I always maintained the best interests of
14 the Class while performing my Class Representative duties.

15 8. Furthermore, it is my opinion that a Five Thousand Dollars (\$5,000) Class
16 Representatives Service Payment for myself is fair, reasonable and adequate because in addition to
17 the many hours spent participating in the prosecution of this case, I accepted the potential risk of
18 being liable for the opposing parties' costs if we were unsuccessful in this lawsuit. I understand
19 these costs could be thousands of dollars based on likely lengthy and expensive litigation ensuing
20 for several years and I believed in this case and was willing to risk this to be a lead plaintiff and
21 pursue this class action litigation. Further, I realize being a named Plaintiff in a lawsuit against an
22 employer could affect my future employment opportunities.

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1 9. I understand that Kokozian Law Firm, APC and Blackstone Law, APC and David
2 Yeremian & Associates, Inc. will split the attorney fees in this matter. I consented to this fee split
3 in writing. I further understand that the fee split will not lower my share.

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

1/26/2023

6 Executed this day _____, at Los Angeles, California.

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8 

9 _____
SHORNIKAY CALLUM