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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 PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL**

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

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

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

5 Defendants

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

10 Plaintiffs,

11 vs.

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

18 Defendants.

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21 Bruce Kokozyan, Esq. (SBN 195723)
Alex DiBona, Esq. (SBN 265744)
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27 SHORNIKAY CALLUM, individually and on behalf of all others
28 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 California. 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 am one of the named plaintiffs in this action, and I seek to be appointed as one of the representatives of the proposed class for purposes of settlement.

3. I was employed by Defendants AMI Expeditionary Healthcare, LLC and AMI Expeditionary Healthcare (USA), LLC (“Defendants” or “AMI”) from approximately May 2021 to November 2021 as a 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. I was a non-exempt, hourly-paid employee throughout my employment. I decided to seek legal advice about my work experiences at Defendants and about filing a lawsuit to seek to redress my grievances. I contacted Blackstone Law, APC and spoke with the attorneys there. I wanted to take steps to make sure Defendants were held accountable for not properly compensating their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a class and PAGA action.

4. I am aware of and understand the duties and responsibilities of a class representative in litigating a class action matter. In that regard, and since becoming involved in this matter, I have actively participated in the matter. I have regularly conferred with my attorneys regarding the case and fulfilling my responsibilities as a class action and PAGA representative, which has included providing documents concerning my employment with Defendants, reviewing documents with my attorneys and answering

1 their questions, providing information and guidance regarding the duties of other non-exempt employees,
2 and helping develop a strategy as to what documents and information to obtain from Defendants. I
3 routinely checked in with my attorneys and their staff to make sure that they had all of my most current
4 information and any additional information that I had obtained.

5 5. Throughout my involvement in this case, I was available to answer any questions my
6 attorneys had and was available to speak and meet with my attorneys whenever they needed me. I
7 responded to them as quickly as possible and gave them as much information as I could. I described
8 policies, practices, and procedures of Defendants. I contacted and referred several potential witnesses
9 and potential class members to my attorneys. I also communicated with my attorneys and assisted their
10 efforts to prepare for mediation.

11 6. Following the mediation, I reviewed the settlement agreement. I discussed the settlement
12 agreement with my attorneys and asked them questions before I signed it. I believe the settlement obtained
13 is fair and reasonable based on the facts and claims, and the risks involved in continuing to litigate this
14 matter, as I understand them.

15 7. I believe that I have done everything that my attorneys have asked of me and tried, to the
16 best of my ability, to seek relief for the class, the aggrieved employees, and the State of California. I think
17 my efforts helped to get the result obtained in this case. I believe I fulfilled my duties as a Class and
18 PAGA representative and put the interests of the class and other aggrieved employees ahead of my own.

19 8. I also believe that my interests have been and continue to be aligned with the Class and
20 PAGA Members, and I have been and continue to be willing to vigorously pursue the claims on the
21 collective behalf of all Class and PAGA Members. Consequently, I do not believe that I have any interests
22 that are adverse to the interests of the Class and PAGA Members.

23 9. I understand that any resolution of this lawsuit on a class-wide basis is subject to court
24 approval, and any settlement must be designed in the best interest of the class as a whole. I have at all
25 times throughout the course of this litigation considered the interest of the class.

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

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7 11. Last, I believe that the requested enhancement award is fair given the risks that I have
8 willingly taken in bringing this case against my former employer. Given the ease of access to information
9 on the internet, the risk of stigma and future retaliation against me due to my role in this litigation is very
10 real. I chose to accept that risk that my participation in this lawsuit may negatively affect future
11 employment in this industry, or even other industries that I may choose to pursue.

12 12. I am not related to anyone associated with Blackstone Law, APC.

13 13. I understand that Blackstone Law, APC, David Yeremian & Associates, Inc., and
14 Kokozian Law Firm, APC will share the attorney fees in this action. I agreed to this in writing. I
15 understand that the amount of attorney's fees will not increase as a result of this fee sharing.
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18 I declare under penalty of perjury under the laws of the state of California that the foregoing is
19 true and correct. Executed on 02/16/2023, at New York, New York.

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