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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
ASHLEY CHARLEMAGNE 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.

12
 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
 16 entity of unknown form; AMI
 EXPEDITIONARY HEALTHCARE, a
 17 business entity of unknown form; and DOES 1
 through 50, Inclusive

18 Defendants.

20
 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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5 **DAVID YEREMIAN & ASSOCIATES, INC.**

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9 Facsimile: (818) 230-0308

10 Attorneys for Plaintiffs

11 ASHLEY CHARLEMAGNE,

12 BRIANNA HUGUELY, MARIA LEWIS,

13 and SHARON LEWIS on behalf of themselves and others similarly situated

DECLARATION OF ASHLEY CHARLEMAGNE

I, Ashley Charlemagne, declare and state as follows:

1. I am over the age of eighteen (18) and I am a resident of the State of Florida. 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 the named plaintiff in this action, and I seek to be appointed as the representative 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 February 2021 to November 23, 2022. I retained the law firms of David Yeremian & Associates, Inc. to represent me in this class action lawsuit against Defendants for the alleged practices and violations as stated in the operative Complaint in this action.

4. I believe that I am similarly situated to all other Class Members who worked for Defendants during the Class Period and who were similarly affected by Defendants' policies and practices regarding payment of minimum wages and overtime, meal periods, rest periods, provision of accurate wage statements, final payment of wages to terminated or resigned employees, unreimbursed of expenses, failure to keep required payroll records, alleged violations of the unfair competition law, and alleged violations under the Private Attorney General's Act. I believe my claims against Defendants are typical of the other Class Members because I believe the claims asserted in the operative Complaint are also shared by the other Class Members.

5. Additionally, I believe that my interests have been and continue to be aligned with all Class Members, and I have been and am willing to continue to pursue the Class Members' claims vigorously on our collective behalf. As a result, I firmly believe that I do not have any interests that are adverse to the interests of the Class Members.

6. As a Class Representative, I believe I have maintained the best interests of the Class Members. I have actively participated in this litigation and have been continuously apprised of the progress of the case. I have provided documents and evidence to Class Counsel in support of the class claims. I have also invested significant time and efforts in performing my duties on behalf of the Class,

1 including preparing for settlement negotiations and speaking to witnesses. I devoted numerous hours of
2 my time to all of the above tasks to vigorously represent the interests of the Settlement Class.

3 7. I believe the Settlement obtained on behalf of the Settlement Class is fair and reasonable
4 in view of the facts, claims and the risk of going through further litigation in this case.

5 8. I have not yet received any consideration or promises that are different than any of the
6 other Class Members. In my opinion, the requested enhancement award of \$5,000.00 is fair and
7 reasonable given the risks I have taken, the tasks I have performed, the time I have invested, and the real
8 benefit which the Class Members will receive from this class action. I view this settlement as fair and
9 reasonable to all Class Members.

10 9. I freely chose to champion the interests of the Class and freely accepted the risks of being
11 a Class Representative in a class action that could stigmatize me and, although unknown at this time,
12 may affect my future employability in this industry or any other industry. I also do not believe my
13 decision to accept the Settlement and proposed \$5,000.00 enhancement award compromised my duty to
14 protect the interest of the Class. I also understand the \$5,000.00 enhancement award is subject to the
15 Court's approval and discretion. Furthermore, although there is no record of such activity, I accepted the
16 real risk of potentially being liable for the opposing parties' costs and attorneys' fees if I were
17 unsuccessful in this lawsuit.

18 7. I am not related to anyone associated with David Yeremian & Associates, Inc.

19 8. I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.
21

22 Executed on 1/12/2023, at Lake Alfred, Florida.

DocuSigned by:

23 *Ashley Charlemagne*
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26 Ashley Charlemagne
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