

D.LAW, INC.
Emil Davtyan (SBN 299363)
Emil@d.law
Roman Shkodnik (SBN 285152)
r.shkodnik@d.law
Emma Geesaman (SBN 352715)
e.geesaman@d.law
880 E Broadway
Glendale, CA 91205
Telephone: (818) 962-6465
Fax: (818) 962-6469

DAVID YEREMIAN & ASSOCIATES, INC.
David Yeremian (SBN 226337)
david@yeremianlaw.com
880 E Broadway
Glendale, CA 91205
Telephone: (818) 962-6465
Fax: (818) 962-6469

Attorneys for Plaintiffs, ASHLEY CHARLEMAGNE,
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 PLAINTIFF
ASHLEY CHARLEMAGNE 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.

Jonathan M. Genish (SBN 259031)
jgenish@blackstonepc.com
Miriam Schimmel (SBN 185089)
mschimmel@blackstonepc.com
Joana Fang (SBN 309623)
jfang@blackstonepc.com
Alexandra Rose (SBN 329407)
arose@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

1 Attorneys for Plaintiff MATTHEW SAVATTIERI,
2 on behalf of himself, and all others similarly situated

3 Bruce Kokozyan (SBN 195723)
4 bkokozyan@kokozyanlawfirm.com
5 Alex DiBona (SBN 265744)
6 dibona@kokozyanlawfirm.com
7 **KOKOZYAN LAW FIRM, APC**
8 10940 Wilshire Blvd., Ste 1200
9 Los Angeles, California 90024
10 Tel: (323) 857-5900 / Fax: (310) 275-6301

11 Attorneys for Plaintiffs
12 SHORNIKAY CALLUM, individually and on behalf of all others
13 similarly situated
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 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 was employed by Defendants AMI Expeditionary Healthcare, LLC; AMI Expeditionary Healthcare (USA), LLC; and AMI Extraordinary Healthcare (together, “Defendants” or “AMI”) from approximately February 2021 to November 23, 2022 as an hourly-paid, non-exempt Logistics Manager. As a Logistics Manager, I was responsible for fleet operations. My day-to-day tasks included, but were not limited to, coordinating the pick-up of vehicles, ensuring all vehicles were serviced on time, filing reports for insurance purposes, and communicating with individuals regarding any accidents that occurred involving AMI’s vehicles.

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.

4. I decided to seek legal advice about my work experiences at AMI and about filing a lawsuit to seek to redress my grievances. I contacted David Yeremian & Associates, Inc. and D.Law, Inc., and spoke with the attorneys there. Thereafter, I further consulted with the attorneys at David Yeremian & Associates, Inc. and D.Law, Inc. 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.

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

6. Throughout my involvement in this matter, I was available to answer any questions my

1 attorneys had and was available to speak and meet with my attorneys whenever they needed me. I
2 responded to them as quickly as possible and gave them as much information as I could. I described the
3 policies, practices, and procedures of Defendants. I contacted and referred several potential witnesses
4 and potential class members to my attorneys.

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

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

12 9. I believe that I have done everything that my attorneys have asked of me and tried, to the
13 best of my ability, to seek relief for the Class, the Aggrieved Employees, and the State of California. In
14 total, I have spent numerous hours participating in this matter as described above. I think my efforts
15 helped to get the result obtained in this matter. I believe I fulfilled my duties as a Class and PAGA
16 representative and put the interests of the Class and other Aggrieved Employees ahead of my own.

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

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

24 12. I respectfully request that the Court approve and award me a service payment in the
25 amount of \$5,000.00 for my efforts and active participation in this matter and for giving a general release
26 of all claims pursuant to California Civil Code section 1542. Taking into consideration that the time that
27 I dedicated to this matter, I believe that this amount is reasonable. I affirm that I have not received any
28

1 other consideration or promises for any other consideration.

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

7 14. I am not related to anyone associated with Blackstone Law, APC, David Yeremian &
8 Associates, Inc., D.Law, Inc., or Kokozyan Law Firm, APC.

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

12 I declare under penalty of perjury under the laws of the state of California that the foregoing is
13 true and correct. Executed on 1/19/2024, at Lake Alfred, Florida.

14 DocuSigned by:
15 
16 C4BE61BFF6BD478
17 Ashley Charlemagne
18
19
20
21
22
23
24
25
26
27
28