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7 Attorneys for Plaintiff,
DEJA NAIR, and all others similarly situated
8

9
10 UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
11

12 DEJA NAIR, on behalf of herself, all others
similarly situated, the general public, and as an
13 “aggrieved employee” on behalf of other
“aggrieved employees” under the Labor Code
14 Private Attorneys General Act of 2004,

15 *Plaintiff(s),*

16 vs.

17 MEDLINE INDUSTRIES, INC., an Illinois
18 corporation; MEDLINE INDUSTRIES
HOLDINGS, L.P., a Delaware limited
19 partnership; MEDLINE INDUSTRIES, LP, an
20 Illinois limited partnership; and DOES 1–50,
inclusive,
21

22 *Defendant(s).*
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Case No. 2:22-CV-00331-DAD-JDP

**DECLARATION OF DEJA NAIR IN
SUPPORT OF PLAINTIFF DEJA
NAIR’S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Action filed: 12/22/2021
Hearing Date: 05/18/2026
Hearing Time: 1:30 p.m.
Hearing Court: 4, 15th floor, The
Honorable Dale A.
Drozdz



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**DECLARATION OF DEJA NAIR IN SUPPORT OF PLAINTIFF DEJA NAIR'S
MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, DEJA NAIR, and state as follows:

1. I am a resident of the City of Hayward, in the State of California and am over 18 years of age. I am the plaintiff in this action and am represented by David Spivak of The Spivak Law Firm and WALTER L. HAINES of United Employees Law Group in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I understand that, as Class Representative, I have certain duties and responsibilities to the Class Members and believe that I have fairly represented the interests of all Class Members during the entire course of this case.

3. My counsel provided me with information regarding class actions, how they work, and what my duties would be as the Class Representative. I agreed to serve as a Class Representative so that I could seek to recover wages and penalties on behalf of myself and other employees like me.

4. I understand that the Settlement in this case is subject to this Court's approval to ensure that it is in the best interest of the Class as a whole. I have no conflicts with the Class.

5. I understand that my attorneys are submitting an application to this Court for a Class Representative Service Payment to compensate me for my unique contributions to the success of this action as the Class Representative in the amount of \$20,000.00. I believe this amount is fair and reasonable compensation for my efforts in this case and the risks I have taken in pursuing a fair recovery for the Class Members.

6. I have provided Defendants with a general release of any and all claims, known or unknown, I may have against Defendants. By agreeing to settle the case in the best interest of the Class Members, I have given up the right to pursue my individual claims for unpaid wages and penalties and to potentially recover substantially more for unpaid wages, interest, waiting time penalties, and pay stub penalties. I did not seek an individual settlement for my claims at all, instead choosing to prosecute this matter on behalf of my coworkers. By pursuing the claims of



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1 all Class Members, I have also rendered my own individual payment uncertain and delayed its
2 payment by several months (at the least).

3 7. As Class Representative, I assumed a fiduciary role to the Class. I agreed to (1)
4 consider the interests of the Class just as I would consider my own interests and, in some cases,
5 to put the interests of the Class before my own interests; (2) actively participate in the lawsuit, as
6 necessary, by among other things, producing documents to Defendants and giving depositions
7 and trial testimony if requested; (3) travel to give such testimony; (4) recognize and accept that
8 any resolution of the lawsuit by dismissal or settlement, is subject to court approval, and must be
9 designed in the best interest of the Class as a whole; (5) follow the progress of the lawsuit and
10 provide all relevant facts to my attorneys; (6) champion many other people with similar claims
11 and injuries because of the importance of the case and the necessity that all Class Members benefit
12 from the lawsuit; and (7) fight for a resolution in which the individual recoveries to each Class
13 Member, including me, maybe relatively small. I agreed to shoulder all of these responsibilities
14 in exchange for a proportionate share of funds made available for distribution to the Class
15 Members. I had no guarantee of a Class Representative Service Payment. I have many hours of
16 my time in connection with this case to date. Should this Court grant preliminary approval, I will
17 provide an activity log and the total hours I spent on this case in my declaration in support of the
18 motion for final approval. I have prepared showing the estimates of time I spent on various work
19 performed in this case. The activities I have performed have included, but have not been limited
20 to: obtaining legal counsel, speaking with my legal counsel on numerous occasions, over the
21 phone, informing them of the terms and conditions of my coworkers' employment, assisting them
22 in gathering information, identifying the claims brought in this case, gathering contact
23 information for my former coworkers, contacting Class Members about the lawsuit to arrange
24 their communications with my attorneys, gathering documents from my employment with
25 Defendants, and being actively involved in the settlement process to ensure a fair result for the
26 Class as a whole. I also participated in the mediation and spent time carefully reviewing the
27 Settlement, and other case related documents on my own and with my counsel to make sure that
28 the Settlement and other work my attorneys performed are in the best interest of the Class



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1 Members.

2 8. Further, my counsel have advised me of the possibility that, if the case was lost, I
3 could have been ordered to pay Defendants' costs and even attorneys' fees in this case, which
4 could have been thousands of dollars by the end.

5 9. Because I filed this lawsuit, there is a public record at the Court showing that I
6 brought a class action for unpaid wages against my former employer. The Class Representative
7 Service Payment to me of \$20,000.00 is not equal to the harm to my future career prospects that
8 this case may cause me.

9 10. Based on the time, risk, stigma, loss of benefits and income and great outcome of
10 this case, I believe that the requested Class Representative Service Payment for me is fair and
11 reasonable. As such, I respectfully request that the Court award the requested Class
12 Representative Service Payment of \$20,000.00.

13 I declare under penalty of perjury of the laws of the United States of America that the
14 foregoing is true and correct.

15 Executed on 04 / 13 / 2026 in Hayward, California.

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18 DEJA NAIR,
19 Declarant
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