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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA CLARA**

LINDSEY SUMNICHT, ZOLA STAMPER, and
FARRAH ALIZADEH, individuals, on behalf of
themselves and on behalf of all persons similarly
situated,

Plaintiffs,

v.

AMN SERVICES, LLC, a Limited Liability
Company, and DOES 1 through 50, inclusive,

Defendants.

Case No. **22CV397191**

**DECLARATION OF FARRAH
ALIZADEH IN SUPPORT OF
SETTLEMENT APPROVAL**

Judge: Hon. Theodore Zayner
Dept.: 19

Action Filed: April 22, 2022
Trial Date: Not set

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DECLARATION OF FARRAH ALIZADEH

I, Farrah Alizadeh, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter. This declaration is submitted in support of approval of the proposed class action settlement ("Settlement") reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for AMN Services, LLC ("AMN") as a traveling nurse at various hospitals throughout the State of California, including Los Angeles County. I worked for AMN from approximately December 2018 until August 2022. My duties included assessing patients, administering treatments and medications, performing diagnostic tests, and coordinating with doctors, specialists, and other nurses to create and modify patient care plans.

3. During my employment with AMN, I was scheduled to work 12-hour shifts 3 times per week. However, I often worked outside my scheduled hours but was only permitted to record only scheduled shifts. For example, I was required to update patient charts prior to leaving my workplace. However, because AMN did not allow me to clock out past my scheduled end time, I was forced to clock out and complete charting tasks off-the-clock, without compensation. In addition, I also worked off the clock with respect to time I spent undergoing mandatory drug testing that was a condition of my employment.

4. Additionally, due to staffing shortages and workplace demands, I was interrupted during meal and rest periods. I also had to delay or even skip both rest and meal periods for the same reason. For shifts exceeding 10 hours, AMN failed to provide me with a second meal period as well as with a third rest period.

5. It is my understanding that I was not paid all of my wages because of AMN's policy requiring off-the-clock work. Additionally, I did not receive proper compensation for my late, interrupted, or skipped rest and meal periods.

6. I brought this lawsuit against AMN because I wanted AMN to abide by the law and give its employees what we are owed. I believe I took on a greater burden than other AMN employees because I willingly attached my name to the lawsuit even though I understood it would be a public record. I took

1 on this risk because I felt it was necessary to stand up to the company for the sake of my fellow co-
2 workers and for my own sake.

3 7. I have been an active participant in this case since first consulting with my attorneys
4 almost a year ago. I have been in close contact with my attorneys and provided all the documents and
5 information they needed to initiate the case. I spoke with my attorneys on numerous occasions regarding
6 this case and discussed AMN's policies and practices at length. Overall, I estimate I spent at least 15
7 hours on activities leading to the resolution of this matter.

8 I declare under penalty of perjury under the laws of the state of California and the United States
9 that the foregoing is true and correct. Executed on Sep 12, 2025, in Los Angeles, California.

10 *Farrah Alizadeh*
Farrah Alizadeh (Sep 12, 2025 12:15:03 PDT)

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