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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 ANDREW J.
ROWBOTHAM IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA ACTION
SETTLEMENT**

Judge: Hon. Theodore Zayner
Dept.: 19

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

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I, Andrew J. Rowbotham, declare as follows:

1. I am a Partner at Haines Law Group, APC, and I serve as counsel for one of the named defendants in this action, Farrah Alizadeh (“Plaintiff”). I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in the declaration and could testify competently to them if called upon to do so.

2. I am a 2014 graduate of Pepperdine University School of Law and was admitted to the California State Bar in December 2014. Since that time, I have practiced exclusively in plaintiff-side employment litigation. From October 2014 to May 2015, I worked as an associate at the Mesriani Law Firm, an employment law firm in Santa Monica, California. The vast majority of my work focused on representing employees in wage and hour matters and wrongful termination actions.

3. Since April 2016, I have worked at my current firm, Haines Law Group, APC. I am actively involved with approximately 60 active wage and hour class and representative actions, including a number of hybrid actions asserting nationwide wage and hour claims under the Fair Labor Standards Act, as well as California-specific claims under Rule 23 of the Federal Rules of Civil Procedure. In these actions, I play a significant role in developing case strategies and discovery plans and in analyzing timekeeping, payroll, personnel, and policy data on a classwide basis. My responsibilities also include: identifying potential cases; conducting client and witness interviews; preparing for, taking, and managing depositions of plaintiffs, putative class members, and corporate witnesses; researching and drafting law and motion, including motions to compel, motions for class certification, dispositive motions, and motions for preliminary and final approval; arguing motions and attending case management and court hearings; negotiating class and representative action settlements and drafting long-form settlement agreements; and working with settlement administrators to implement settlements and monitor the settlement administration process.

4. The following is a non-exhaustive list of wage and hour class actions that have been granted approval in which I have been named as Class Counsel:

- *Rodriguez v. Spartan, Inc.*, Case No. BCV-15-100007-DRL, California Superior Court, County of Kern, Honorable David R. Lampe, presiding;

- 1 • *Tapper v. Squad Security CA, Inc.*, Case No. BC607241, California Superior Court, County of
- 2 Los Angeles, Honorable John Shepard Wiley Jr., presiding;
- 3 • *Nieves v. Ta Chen International, Inc.*, Case No. BC609005, California Superior Court, County
- 4 of Los Angeles, Honorable Kenneth R. Freeman, presiding;
- 5 • *Mansilla v. Haeco Americas Line Services, LLC*, Case No. BC615310, California Superior
- 6 Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;
- 7 • *Rodriguez v. Mersen USA Oxnard-CA Inc.*, Case No. 56-2015-00471031-CU-OE-VTA,
- 8 California Superior Court, County of Ventura, Honorable Kent M. Kellegrew, presiding;
- 9 • *Khosravi v. Enterprise Rent-A-Car Company of Los Angeles, LLC*, Case No. 30-2016-
- 10 00829923-CU-OE-CXC, Superior Court of California, County of Orange, Honorable Thierry
- 11 Patrick Colaw, presiding;
- 12 • *De Loera v. Pharmaceutic Litho & Label Company, Inc.*, Case No. 56-2016-00479931-CU-
- 13 OE-VTA, Superior Court of California, County of Ventura, Honorable Kent M. Kellegrew,
- 14 presiding;
- 15 • *Ortiz v. Endologix, Inc.*, Case No. 30-2016-00873893-CU-OE-CXC, Superior Court of
- 16 California, County of Orange, Honorable William D. Claster, presiding;
- 17 • *Delgado v. Pacific Coast Cabling, Inc.*, Case No. BC600419, Superior Court of California,
- 18 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
- 19 • *Valsabel v. Vintage Tile & Stone, Inc.*, Case No. 30-2016-00848602-CU-OE-CXC, Superior
- 20 Court of California, County of Orange, Honorable Randall J. Sherman, presiding;
- 21 • *Ramos v. Da/Pro Rubber, Inc.*, Case No. BC621297, Superior Court of California, County of
- 22 Los Angeles, Honorable William F. Highberger, presiding;
- 23 • *Lopez v. Bornt & Sons, Inc.*, Case No. ECU09820, Superior Court of California, County of
- 24 Imperial, Honorable Jeffrey B. Jones, presiding;
- 25 • *Ruvalcaba Quiroz v. Circle M Contractors, Inc.*, Case No. 30-2016-00885065-CU-OE-CXC,
- 26 Superior Court of California, County of Orange, Honorable William D. Claster, presiding;
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- 1 • *Armenta, et al., v. California Friends Homes d/b/a Quaker Gardens*, Case No. 30-2016-
2 00883282-CU-OE-CXC, Superior Court of California, County of Orange, Honorable Randall
3 J. Sherman, presiding;
- 4 • *Ayala, et al., v. Dearden's*, Case No. BC679750, Superior Court of California, County of Los
5 Angeles, Honorable Elihu M. Berle, presiding;
- 6 • *Becerra v. All Valley Washer Service, Inc.*, Case No. BC663448, Superior Court of California,
7 County of Los Angeles, Honorable Amy D. Hogue, presiding;
- 8 • *Song, et al. v. Blendtec, Inc.*, Case No. STK-CV-VOE-2016-6272, Superior Court of
9 California, County of San Joaquin, Honorable Roger Ross, presiding;
- 10 • *Zinnerman v. Tumbleweed Educational Enterprises, Inc.*, Case No. BC673708, Superior Court
11 of California, County of Los Angeles, Honorable Maren E. Nelson, presiding;
- 12 • *Chairez v. B.E. McCarty, Inc.*, Case No. 56-2017-00503353-CU-OE-VTA, Superior Court of
13 California, County of Ventura, Honorable Vincent O'Neill, presiding;
- 14 • *Garcia, et al. v. Simplified Labor Staffing Solutions, Inc.*, Case No. BC696898, Los Angeles
15 County Superior Court, Honorable Elihu M. Berle, presiding (approving an hourly rate of \$400
16 for work performed in 2018 and 2019);
- 17 • *Delgado v. Spears Manufacturing Co.*, Case No. BC709665, Los Angeles County Superior
18 Court, Honorable Maren E. Nelson, presiding (approving an hourly rate of \$425 for work
19 performed in 2018, 2019, and 2020);
- 20 • *Soto v. L I Metal Systems*, Case No. 37-2017-00009607-CU-OE-CTL, San Diego County
21 Superior Court, Honorable Timothy Taylor, presiding (approving an hourly rate of \$425 for
22 work performed from 2017-2020);
- 23 • *Fishback v. Paragon Framing, Inc.*, Case No. CIVDS1906610, San Bernardino County
24 Superior Court, Honorable David Cohn, presiding (approving an hourly rate of \$425 for work
25 performed in 2019 and 2020);
- 26 • *Fishback v. J.D. Miller Construction Inc.*, Case No. CIVDS1906611, San Bernardino County
27 Superior Court, Honorable David Cohn, presiding (approving an hourly rate of \$425 for work
28 performed from 2019-2021);

- 1 • *Teeba v. Brill, Inc.*, Case No. CIVDS1923242, San Bernardino County Superior Court,
2 Honorable David Cohn, presiding (approving an hourly rate of \$425 for work performed from
3 2019-2021);
- 4 • *Gonzalez v. Precision Hospitality & Development, LLC*, Case No. 30-2020-01127597-CU-
5 OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman, presiding
6 (approving an hourly rate of \$450 for work performed in 2020 and 2021);
- 7 • *Vides v. Celoseal Roofing, Inc.*, Case No. 30-2020-01162478-CU-OE-CXC, Orange County
8 Superior Court, Honorable Randall J. Sherman, presiding (approving an hourly rate of \$475
9 for work performed from 2020-2022);
- 10 • *Qawas v. Socal Framing, Inc.*, Case No. RIC1902588, Riverside County Superior Court,
11 Honorable Sunshine S. Sykes, presiding (approving an hourly rate of \$475 for work performed
12 from 2019-2022);
- 13 • *Nelson v. Santini Foods, Inc.*, Case No. RG21090890, Alameda County Superior Court,
14 Honorable Evelio Grillo, presiding (approving an hourly rate of \$475 for work performed in
15 2021 and 2022);
- 16 • *Zuniga v. Sonar Inc.*, Case No. 30-2019-01117310-CU-OE-CXC, Orange County Superior
17 Court, Honorable Peter Wilson, presiding (approving an hourly rate of \$575 for work
18 performed from 2019-2023);
- 19 • *Gonzalez v. Guardian Industries LLC*, Case No. 19CECG02134, Fresno County Superior
20 Court, Honorable Jonathan M. Skiles, presiding (approving an hourly rate of \$575 for work
21 performed from 2019-2023);
- 22 • *Sanchez v. Dutton Home Services, LLC*, Case No. 22STCV01834, Los Angeles County
23 Superior Court, Honorable Maren E. Nelson, presiding (approving an hourly rate of \$575 for
24 work performed from 2022-2023);
- 25 • *Ramirez v. Wyndham Vacation Ownership, Inc.*, Case No. 20CV01715, Santa Barbara County
26 Superior Court, Honorable James F. Rigali, presiding (approving an hourly rate of \$650 for
27 work performed from 2020-2024).

1 5. I have also been named Class Counsel for a certified class following a contested motion
2 for class certification in the following case:

- 3 • *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San
4 Bernardino Superior Court, Honorable David Cohn, presiding (certifying a wage statement
5 class).

6 6. In March 2023, I served as trial counsel for the plaintiff and the aggrieved employees in
7 the matter of *Abraham Taduran v. James R. Glidewell, Dental Ceramics, Inc. dba Glidewell Laboratories*,
8 Case No. 30-2017-00934037-CU-OE-CXC, Orange County Superior Court, Honorable William Claster,
9 presiding. This was a case brought under the Private Attorneys General Act, Labor Code §§ 2698 *et seq.*,
10 that resulted in a six-figure verdict in favor of the aggrieved employees.

11 7. Between 2020 and 2025, Thomson Reuters recognized me as a Top Young Attorney in
12 Southern California in its annual Rising Stars edition of Super Lawyers. This honor is awarded to no more
13 than 2.5% of attorneys under the age of 40 in Southern California each year.

14 8. As counsel for Plaintiff Alizadeh, I have been closely involved in all aspects of this
15 litigation since its inception. On March 17, 2025, my firm filed a wage and hour class action on behalf of
16 Plaintiff against Defendant in the Los Angeles Superior Court, captioned *Farrah Alizadeh v. AMN*
17 *Healthcare, Inc., et al.*, Case No. 25STCV07703 (the “Alizadeh Action”). After the parties agreed to
18 proceed in this case rather than in the Alizadeh Action, Plaintiffs filed a stipulation for leave to file a
19 Second Amended Complaint adding the claims alleged in the Alizadeh Action. Plaintiff Alizadeh
20 dismissed the Alizadeh Action without prejudice on July 15, 2025. Plaintiffs then filed the Second
21 Amended Complaint on September 4, 2025. The details of the settlement and the settlement approval
22 process are set forth in the declaration of Kyle R. Nordrehaug, filed concurrently herewith.

23 9. I confirm that neither I nor anyone at Haines Law Group, APC is affiliated in any way with
24 the proposed Settlement Administrator, Apex Class Action (“Apex”). I do not have any financial interest,
25 ownership interest, or other relationship with Apex that could create a conflict of interest or call into
26 question the neutrality of the settlement administration process.

1 I declare under penalty of perjury under the laws of California and the United States that the
2 foregoing is true and correct. Executed on December 10, 2025, at El Segundo, California.

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6 Andrew J. Rowbotham
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