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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

MIREYA ARTEAGA; individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

ARCH HEALTH PARTNERS, an unknown
business entity; PACIFIC ACCOUNTABLE
MANAGEMENT, LLC, a California limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 37-2019-00041863-CU-OE-CTL

Honorable Timothy Taylor
Department C-72

CLASS ACTION

**DECLARATION OF MIREYA
ARTEAGA IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Ovsanna Takvoryan); and
[Proposed] Order filed concurrently
herewith]

Date: November 18, 2022
Time: 1:30 p.m.
Department: C-72

Complaint Filed: August 9, 2019
Trial Date: None Set

DECLARATION OF MIREYA ARTEAGA

I, **Mireya Arteaga**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. 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 Arch Health Partners, Inc. and Pacific Accountable Management, LLC (together, “Defendants”) as an hourly-paid, non-exempt Lead Patient Access Specialist, from approximately May 2017 to approximately July 2017. I decided to seek legal advice about my work experiences with Defendants. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwazian. I wanted to do whatever I could to make sure Defendants were held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 7 hours discussing my situation, complex wage-and-hour class actions and, eventually, representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and, eventually, a PAGA representative.

3. I have spent over 20 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of 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.

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1 4. I was available to answer any questions my attorneys had, and available to speak
2 and meet with my attorneys whenever they needed me. I responded to them as quickly as
3 possible and gave them as much information and identified as many documents as I could. I
4 spent at least 14 additional hours speaking with my attorneys about the case, identifying potential
5 witnesses, providing my attorneys with documents and information concerning the case, and also
6 describing policies, practices, and procedures of Defendants. During the discovery phase of the
7 litigation, I spent approximately 12 additional hours reviewing Defendants' discovery requests,
8 locating documents, and providing documents, and responses to my attorneys.

9 5. On October 9, 2020, I attended a full day of deposition that lasted approximately
10 7.5 hours. I spent at least 4 hours preparing for the deposition and approximately an additional
11 forty (40) minutes traveling to and from the deposition. After the deposition, I spent at least 3
12 hours reviewing my testimony and discussing the contents of the deposition transcript with my
13 attorneys.

14 6. As far as the settlement is concerned, I was available to review documents and
15 answer any questions my attorneys had. I spent about 5 hours reviewing the settlement
16 agreement and about 4 hours asking questions and discussing the potential settlement with my
17 attorneys before signing the settlement agreement.

18 7. I believe that I have done everything that my attorneys have asked of me and have
19 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
20 and the State of California. I think my efforts helped to get the result obtained in this case, and
21 as a class and PAGA representative, I respectfully request that the Court award me an
22 enhancement award in the amount of \$12,500.00 for my active participation in this case. Taking
23 into consideration the time that I have dedicated to this case, I believe that this amount is
24 reasonable.

25 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

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9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and as an aggrieved employee.

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

Executed this 10/20 day of October 2022, at Escondido, California.

Electronically Signed 2022-10-20 23:46:19 UTC - 172.58.25.87
Nintex AssureSign® e2c67650-8a3d-47b7-ac70-af340167e37f

Mireya Arteaga