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Attorneys for Plaintiff Lisa Medlock, individually,
and on behalf of all others similarly situated.**SUPERIOR COURT OF THE STATE OF CALIFORNIA****FOR THE COUNTY OF SAN FRANCISCO**LISA MEDLOCK, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

BLUE SHIELD OF CALIFORNIA; TALENT
TECHNICAL SERVICES, INC.; and DOES 1
through 20, inclusive,

Defendants.

Case No. CGC-22-600992

*Assigned for all purposes to:**Hon. Ethan P. Schulman, Dept. 304***DECLARATION OF NIMOTA JIMOH IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: July 24, 2024

Time: 9:00am

Dept: 304

1 I, Nimota Jimoh, hereby declare as follows:

2 1. I am the daughter and successor-in-interest of the named plaintiff in this matter, Lisa
3 Medlock. I make this declaration in support of the Motion for Preliminary Approval of Class Action
4 Settlement. I have personal knowledge of the facts set forth herein and if called upon to testify, I could
5 and would do so competently under oath. I am making this declaration in support of Plaintiff's Motion for
6 Preliminary Approval of Class Action Settlement. I have personal knowledge of the matters stated herein
7 and could and would competently testify thereto.

8 2. My Mother, Lisa Medlock, filed this case against Defendant, Talent Technical Services,
9 Inc. July 29, 2022.

10 3. Ms. Medlock passed away on September 04, 2023 at Spring Valley Hospital Medical
11 Center.

12 4. I have been appointed as Ms. Medlock's successor in interest (as defined in Section 377.11
13 of the California Code of Civil Procedure) and succeed to the decedent's interest in the action.

14 5. Based on my mother's experience and knowledge of Defendant's wage and hour policies
15 and her familiarity with its employment practices, she worked with her attorneys to bring claims on her
16 behalf and on behalf of the other employees at Defendant.

17 6. I am seeking to have Ms. Medlock become the Class Representative in this case for the
18 purpose of having the Settlement Agreement approved. I believe my mother's experiences are similar to
19 other employees who worked for Defendant. My mother believed they were all subject to the same
20 employment policies and practices.

21 7. Neither I nor my mother have conflicts with other employees that would hinder my ability
22 to represent them. Therefore, I believe I can adequately represent the other non-exempt employees of
23 Defendant.

24 8. My interests in this litigation are not adverse to the interest of the other employees. My
25 mothers' interests were similarly the same as the interests of the other employees because they were all
26 subject to the same policies and practices and were similarly injured by Defendant's company-wide
27 policies and practices. I am seeking the same recovery on behalf of my mother and other employees, which
28

1 is to collect unpaid wages, interest, and penalties that are owed by Defendant, pursuant to the Settlement
2 Agreement.

3 9. My mother has always kept the best interests of the other employees in mind while
4 performing her duties as the named plaintiff in this action and I will continue to do so as well. My mother
5 was committed throughout the course of this litigation to vigorously prosecuting this case on behalf of
6 herself and the other employees. I believe that she has demonstrated her ability to advocate for the interests
7 of the other employees by initiating this lawsuit, providing documents to her attorneys pertaining to her
8 employment with Defendant, going over the claims and theories with her attorneys, keeping in regular
9 contact with my attorneys regarding the status of this lawsuit, helping my attorneys evaluate the case for
10 settlement, and reviewing the settlement agreement and its terms to make sure it was fair.

11 10. I will continue to actively participate in this lawsuit as necessary, and will continue to make
12 myself available to assist in this case in the future as needed.

13
14 I declare under penalty of perjury under the laws of the State of California that the foregoing is
15 true and correct.

16 Executed on 6/10/2024 | 1:37 PM PDT in California.

DocuSigned by:

NimoTA JimoH

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Nimota Jimoh