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Attorneys for Plaintiff RENEE MAOZ
As an individual on behalf of herself and
on behalf of all others similarly situated and aggrieved

SUPERIOR COURT OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

RENEE MAOZ, as an individual on behalf of
herself and on behalf of all others similarly
situated,

Plaintiff,

v.

DLV VISION MANAGEMENT, LLC, a
California limited liability company; DLV
VISION ASC, LLC, a California limited
liability company; PAUL J. DOUGHERTY,
M.D., INC., a California corporation; ADV
VISION, LLC; a Delaware Limited Liability
Company; and DOES 1-100, inclusive,

Defendants.

CASE NO. 22STCV33937

Assigned for All Purposes to:
Hon. Carolyn B. Kuhl
Dept. SSC-12

DECLARATION OF RENEE MAOZ

Date: May 29, 2024
Time: 10:30 a.m.
Dept.: SSC-12

1 I, Renee Maoz, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am the Named Plaintiff
3 who filed the above-captioned lawsuit. I have personal knowledge of the facts set forth in this
4 declaration. I make this declaration in support of Plaintiff's Motion for Preliminary Approval of
5 Class Action Settlement.

6 2. I was employed by the defendants Renee Maoz ("Plaintiff") has been employed by
7 Defendants as an hourly paid employee from April 2022 to the present at Defendants' Westlake
8 Village location. Plaintiff typically works between 7 and 8 hours per day, 3 days per week. I
9 started out as a clinic technician but quickly was promoted to patient counselor with a \$5/hour
10 raise. After I began training for the new position, the lead trainer started commenting that "your
11 belly is showing" and I was asked if I was pregnant. Soon after, another manager started
12 questioning my "commitment" to the job, especially after I confirmed I was 10 weeks pregnant at
13 the time. Thereafter, Plaintiff's schedule was reduced from 3 days per week to 1 day per week
14 without explanation, and then from June 15, 2022 to August 29, 2022, Plaintiff was removed
15 from the schedule entirely with no justification or explanation, and all of my calls and email about
16 this and my reduced hours were ignored.

17 3. While working for Defendants, in addition to the pregnancy related discrimination
18 I experienced as described above, I don't think I was properly compensated for all hours worked,
19 especially with respect to having to spend several minutes per shift booting up my work computer
20 before clocking in. I also don't think I got all of the lunch breaks I was supposed to get, and I
21 didn't always get rest breaks either. I also had to use my own phone on company business and
22 never received any reimbursement.

23 4. I decided to bring this lawsuit because I did not feel that I was treated fairly as an
24 employee of Defendant, especially with regard to not being paid properly for all the hours I
25 worked, as well missed meal and rest breaks and not getting any expense reimbursement. As a
26 result, I believe the class members and myself are owed additional compensation for all of the
27 time we worked that was not paid for by Defendant, as compensation for not getting all our
28 breaks, and to pay for our expenses.

1 5. It is my understanding this lawsuit could not have been prosecuted or settled
2 unless I or some other employee decided to serve as a named plaintiff and pursue the case. In
3 deciding to serve as a named plaintiff, I understood that my name would be publicly attached to
4 this lawsuit and that my work experiences to some extent would be set forth in a public court file.
5 I recognized that I would need to devote a certain amount of time that I could have spent
6 otherwise. I also recognized that my bringing the lawsuit carried some degree of risk. Despite
7 this, I decided to serve as the named plaintiff without any promise of recovery or compensation.

8 6. I am familiar with the work involved in prosecuting this case. I have participated
9 in numerous meetings and communications with my lawyers regarding this case. I am familiar
10 with the allegations and defenses of the claims in this case. I am familiar with the major events in
11 this case, including the investigation performed by my lawyers, the mediation with Defendant that
12 resulted in this settlement, and the preparation of settlement papers and the need to obtain court
13 approval of the proposed settlement. I participated in all stages of the litigation and provided my
14 lawyers with information and documents regarding my employment with Defendant.

15 7. I believe that the proposed settlement obtained on behalf of the other employees is
16 excellent in view of the issues and risks involved with the case.

17 8. I believe I have fulfilled my duties as a named plaintiff and class representative,
18 which required a significant amount of time and effort during the course of this case. These
19 efforts required dedicating numerous hours to lawsuit activities including, but not limited to: (a)
20 communicating with my attorneys to stay informed of ongoing developments in the case and to
21 discuss the proposed settlement; (b) searching for and providing documents and other materials
22 relating to my work experience; (c) responding to requests for information relating to my work
23 experience; and (d) reviewing filings and key documents including drafts of the complaint and the
24 settlement agreement. These tasks required my dedication of at least 20 hours of my time, which
25 time I honestly could have spent on family, personal time, or work. My understanding is that
26 future tasks may require several more hours of my time. I believe I have been diligent and that I
27 have acted above and beyond that of which is expected of a named plaintiff to date and will
28 continue to do so.

9. It is my opinion that \$5,000.00 is a fair and adequate award for my service as the named plaintiff and class representative for the unpaid wage and missed lunch/rest breaks claims that were brought in the lawsuit, in addition to the separate amount I am getting for settling my pregnancy discrimination claims. I believe that amount is fair and reasonable in view of the work I have and will continue to perform on behalf of the class members. I believe that my role in this lawsuit has resulted in a valuable benefit to the other employees, and I accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful in this lawsuit. I believed in this case, so I was willing to be the named plaintiff to risk this and pursue this class action. I also accepted the risk that news of this lawsuit could also potentially impact my ability to secure other work.

10. Based on the time, service, risk, stress, potential stigma, loss of benefits and excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed on 03 / 28 / 2024, at Lago Vista, Texas.

Renee Lynn M. Maoz

Renee Maoz