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Attorneys for PLAINTIFF

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

STEVE MARTINEZ, an individual, on behalf  
of himself and on behalf of all persons  
similarly situated,

Plaintiffs,

v.

RADIANT SERVICES CORP., a California  
corporation; and DOES 1-50, Inclusive,

Defendant.

Case No. 22STCV23115  
(Related to case No. 22STCV37683)

**DECLARATION OF STEVE MARTINEZ IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

Date: May 4, 2026

Time: 10:00 a.m.

Judge: Hon. Samantha Jessner

Dept.: 7

1 I, STEVE MARTINEZ, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently  
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above-  
4 entitled wage and hour class action lawsuit filed against Defendant RADIANT SERVICES CORP, a  
5 California corporation.

6 2. This declaration is being submitted in support of Plaintiffs' motion for Preliminary  
7 Approval of Class Action and PAGA Settlement between myself and Plaintiff Carla Beatriz Recinos  
8 Castillo (together, "Plaintiffs") and Defendants Radiant Services Corp. and Humanitas Holdings, Inc.  
9 (together, "Defendants").

10 3. I believe that I am, have been, and will continue to represent the interests of the class  
11 fairly and adequately. I have claims that are typical of the claims of the Class Members that I am  
12 seeking to represent.

13 4. Generally, my lawsuit claims that Defendants failed to properly calculate the regular  
14 rate of pay for purposes of overtime, sick pay, and meal period premiums, failed to pay for all hours  
15 worked, failed to provide compliant meal and rest periods, failed to reimburse necessary expenditures,  
16 failed to furnish accurate itemized wage statements, and failed to timely pay wages when due.

17 5. I was employed by Defendant Radiant Services Corp. from December 24, 2021 to March  
18 21, 2022, as an hourly-paid non-exempt employee. At all times during my employment, I was denied  
19 overtime, sick pay, and meal period premiums properly calculated at the regular rate of pay, payment  
20 for all hours worked, legally compliant meal and rest periods, reimbursement for necessary  
21 expenditures, accurate, itemized wage statements, and timely payment for wages when due.  
22 Throughout my employment, I was subject to Defendant Radiant Services Corp.'s written policies and  
23 procedures.

24 6. I believe that my claims are typical of the claims of the Class Members that I am seeking  
25 to represent because I was subject to the same alleged unlawful employment policies and practices at  
26 issue in this action, including but not limited to, Defendants' failure to properly calculate the regular  
27 rate of pay for purposes of overtime, sick pay, and meal period premiums, failure to pay for all hours  
28

1 worked, failure to provide compliant meal and rest periods, failure to reimburse necessary  
2 expenditures, failure to furnish accurate itemized wage statements, and failure to timely pay wages  
3 when due. Factually, Defendants' policies and practices apply class-wide, and Defendants' liability  
4 can be determined by facts common to all members of the Class.

5 7. Further, there is no conflict between my interests and the interests of the Class that I  
6 seek to represent. My interests are entirely coextensive with the interests of the Class. I allege that I  
7 was injured by the same company-wide policies and practices to which the proposed Class was  
8 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests  
9 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the  
10 proposed settlement to assure that it is fair.

11 8. I understood that at the time I filed this action, as a Class Representative, I owed a duty  
12 to the putative class members to faithfully prosecute this action with their best interests at the forefront  
13 of every decision. I understood that I could not make any decision in this action for the sole benefit  
14 of my personal interest. I understood that, in executing this duty, I might have been asked to sacrifice  
15 my personal best interests for the benefit of the interests of the putative class members. Nevertheless,  
16 I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my  
17 former co-workers for what I perceived to be Defendants' unlawful wage and hour practices. I believe  
18 that I faithfully executed the duties of a Class Representative throughout this litigation and will  
19 continue to do so until this litigation is fully and finally resolved.

20 9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,  
21 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and  
22 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.  
23

24 I declare under the penalty of perjury under the laws of the State of California that the foregoing  
25 is true and correct. Executed 01/14/2026, at Los Angeles, California.

26  
27 By:   
Steve Martinez (Jan 14, 2026 18:55:04 PST)  
28 STEVE MARTINEZ