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Attorneys for Plaintiff Mary Magdalena Mejia
and Proposed Class Counsel

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

MARY MAGDALENA MEJIA,
individually and on behalf of all similarly
situated individuals,

Plaintiff,

v.

TOURO UNIVERSITY MEDICAL
GROUP, a California corporation, TOURO
UNIVERSITY CALIFORNIA, form of
entity unknown, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO: STK-CV-UOE-2023-953

*Assigned to the Honorable Barbara Kronlund,
Dept. 10D*

CLASS ACTION

**DECLARATION OF MARY MAGDALENA
MEJIA IN SUPPORT OF UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Date:
Time:
Dept.:

Complaint Filed: February 3, 2023

1 I, MARY MAGDALENA MEJIA, hereby declare and state as follows:

2 1. I am the named Plaintiff in this lawsuit against Defendants Touro University
3 Medical Group and Touro University (“Defendants”) and I submit this declaration in support of
4 Plaintiff’s Unopposed Motion for Preliminary Approval of Class Action Settlement. I am a
5 competent adult and worked for Defendants as an hourly-paid, non-exempt classified employee
6 during the Class Period. I have personal knowledge of the facts set forth herein, and if called as a
7 witness to testify to them, I could and would do so competently.

8 2. I contacted my current attorneys when I questioned the employment practices of
9 Defendants prior to commencing this lawsuit. I accepted the opportunity to act as a Class
10 Representative in a class action on behalf of other employees of Defendants whom I believed
11 were being subjected to labor law violations. Although presented with the opportunity, I did not
12 to pursue this case on an individual basis and instead did so as a class action so that I could help
13 other employees recover for what I believed were Defendants’ illegal practices.

14 3. Specifically, I questioned Defendants’ policies of failing to pay all wages, failing
15 to provide compliant meal and rest periods, failing to timely compensate employees, and issuing
16 its employees incorrect paystubs. Through many discussions with my lawyers, I learned these
17 may be illegal practices and Defendants’ employees might have recourse for all Class Members
18 and Aggrieved Employees.

19 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
20 class ahead of my own. I understood that I could possibly earn a small enhancement payment if
21 this case resolved itself favorably, but always knew that I could also be responsible for paying
22 Defendants’ attorneys’ fees and costs if it did not. My goal in bringing this lawsuit was to obtain
23 a recovery on behalf of the class, and even more importantly, to put an end to what I believed
24 were illegal practices on the part of Defendants. I believe I have achieved both through this
25 lawsuit and settlement.

26 5. I am very happy about the results of this litigation. I am satisfied that Defendants
27 are compensating class members for unpaid wages, penalties, and interest that I believe we are
28 due.

1 6. At the onset of this case, I spent time through numerous phone calls with several
2 of my attorneys explaining what I understood to be the policies and procedures of Defendants and
3 how they were applied to me and others I worked with. During the course of this litigation, up
4 through and following the settlement process, I kept actively involved with its status, tracking the
5 status of the case and participating as much as possible. I assisted and consulted with my
6 attorneys throughout the litigation, provided relevant information, identified witnesses, and
7 helped during an all-day mediation.

8 7. While I have not maintained detailed time records of my activities in connection
9 with this litigation, I believe that have spent a total of approximately 20 hours assisting my
10 attorneys with the preparation of this case, and doing work and analysis independent from my
11 attorneys both before and during this case, including conducting an independent investigation of
12 the facts.

13 8. Before this litigation commenced, and throughout its course, I have spent
14 approximately 8 or more hours gathering, organizing, and reviewing documents and information
15 for this lawsuit. I sifted through many of my own documents and reviewed information produced
16 by Defendants as part of this case.

17 9. I have communicated with my attorneys several times per month to track my
18 case's status. I have taken an active involvement in this matter throughout its course.

19 10. This lawsuit will almost certainly result in reputational harm to me. There is a
20 stigma associated with suing anyone, let alone your former employer. I will probably be
21 adversely affected when it comes to obtaining future employment – employers who learn that I
22 sued Defendants in a class action will likely avoid hiring me.

23 11. I do not believe that I have any conflicts with other members of the class. My
24 interests in bringing this lawsuit – for Defendants to change their labor practices going forward
25 and to compensate current and former employees – are the same as those of all other class
26 members.

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1 I declare, under penalty of perjury, under the laws of the State of California, that the
2 foregoing is true and correct. Executed this ^{03 / 28 / 2024} day of March, 2024 at Stockton, California.

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6 MARY MAGDALENA MEJIA
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Title	Signature for Declaration
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