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25 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

26 **FOR THE COUNTY OF LOS ANGELES**

27 PAUL LOWE, an individual; on behalf of
28 himself and all others similarly situated and
the general public,

Plaintiffs,

v.

RAPID RELIABLE TESTING, LLC, a
Delaware limited liability company; RAPID
RELIABLE TESTING CA, LLC, a California
limited liability company; and DOES 1 to 100,
inclusive,

Defendants.

Case No. 23STCV07047

[Assigned for All Purposes to:
The Hon. Theresa M. Traber, Dept. 1]

**DECLARATION OF PLAINTIFF
CORIELYN MARIE HALL IN SUPPORT
OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND REPRESENTATIVE
ACTION SETTLEMENT**

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DECLARATION OF CORIELYN MARIE HALL

1. I am a party to this action and reside in the State of California. I am fully competent to make this declaration. I have personal knowledge of the facts set forth herein, except for those stated on information and belief, and as to those I am informed and believe them to be true. If called upon to testify, I could and would testify as set forth herein.

2. I make this Declaration in support of Plaintiff’s Motion for Preliminary Approval of Class and Representative Action Settlement.

3. I was employed by Rapid Reliable Testing, LLC, Rapid Reliable Testing CA, LLC, and Ambulnz Health, LLC (collectively “Defendants”), as a non-exempt hourly-paid employee, with duties that included, but were not limited to, measuring vital signs, blood testing, and COVID testing, from approximately August of 2021 through July of 2023.

4. Throughout my employment with Defendants, I am informed and believe that myself and other non-exempt employees of Defendants were not paid all wages owed because we were not paid for all time under Defendants’ control, or for which we were suffered or permitted to work by Defendants. In addition, I am informed and believe we were not paid all overtime hours worked at the overtime rate of pay owed due to, without limitation, failure to record all time worked and failure to pay for off-the-clock work.

5. During my employment with Defendants, I often took meal periods that were after the fifth hour, short or not duty-free. I witnessed other non-exempt employees with my job duties often taking meal periods that were after the fifth hour, short, or not duty-free, as well.

6. I do not recall receiving any premium pay for the full, timely and uninterrupted meal periods I was not provided an opportunity to take and I am informed and believe that my coworkers were not provided premium pay for not being provided with the opportunity to take full, timely and uninterrupted meal periods, either.

7. I do not believe I was provided with opportunities to take full, uninterrupted 10-minute rest periods while working with Defendants and I am informed and believe my coworkers were often not provided with such an opportunity, either.

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1 8. I do not recall receiving any premium pay for the full rest breaks I was not provided
2 an opportunity to take and am informed and believe that my coworkers were not provided
3 premium pay for not being provided with the opportunity to take full, uninterrupted 10-minute
4 rest periods, either.

5 9. I do not recall that I was indemnified with work-related expenses and am informed
6 and believe my coworkers were often not provided with such an opportunity, either.

7 10. I do not recall that I was paid all wages due upon termination and am informed and
8 believe my coworkers were often not provided with such an opportunity either.

9 11. Before and during the course of litigation, I was actively involved in assisting my
10 attorneys to support the wage and hour claims asserted. My involvement began before the initial
11 complaint was filed wherein, I provided first-hand knowledge and documentation as to
12 Defendants' practices, their ownership and corporate structure, and their wage and hour policies
13 and practices.

14 12. Part of the information I relayed was with regard to Defendants' timekeeping, meal
15 and rest period policies and practices.

16 13. I provided them with all the documentation provided to me by Defendants during my
17 employment.

18 14. I assisted in reviewing time and payroll records with my attorneys and informed them
19 of Defendants' employment policies and whether those policies matched Defendants' practices.

20 15. My attorneys called me to ask me questions many times throughout the litigation
21 and I contacted my attorneys several times to stay updated on the case and offer my assistance on
22 any matters I could be helpful with. I was also available for mediation by telephone, during which
23 I was available to be called to answer the questions posed by the mediators regarding the asserted
24 claims, as well as arguments raised by Defendants. In addition, I worked with my attorneys over
25 the next several months after mediation to understand and execute a long form settlement
26 agreement.

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1 16. Over the past several months since the mediation, I have stayed in touch with my
2 attorneys to ensure that there was no undue delay in payment for other class members for whom I
3 brought this Action.

4 17. I believe that, through the present, I have spent at least 25 hours in connection with
5 this matter, which included time spent having preliminary calls with my attorneys; doing an intake
6 with my attorneys; time spent searching for documents relating to my employment; time spent
7 reading and understanding the Settlement Agreement; time spent answering calls to discuss
8 Defendants' timekeeping, pay, meal and rest periods, and to review time and payroll records; time
9 spent discussing with my attorneys Defendants' policies and practices; time spent on-call at
10 mediation; and time spent checking in on the status of the case, among other things. I also spent
11 time preparing this declaration to support Plaintiff's Motion for Preliminary Approval of Class
12 and Representative Action Settlement.

13 18. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
14 rights of other employees who suffered from the same unfair wage practices. I felt that current
15 employees might not want to share their experiences with Defendants since they feared losing
16 their jobs. This is certainly understandable as I, too, have to provide for myself and others.

17 19. By bringing this lawsuit, I have put the interests of the class ahead of my own.

18 20. I understood that I could possibly earn a small enhancement if this case resolved
19 favorably. I also knew that I could face retaliation from Defendants and backlash from former
20 coworkers who are loyal to Defendants. I have also had to provide a general release of claims and
21 a waiver of rights under California Civil Code section 1542 to Defendants as part of the settlement.

22 21. My understanding, in addition, is that if I brought this case individually, I may
23 have earned more compensation individually and on a much quicker timeline than the timeline to
24 resolve this Action.

25 22. I understand the obligations of adequately representing the non-exempt, hourly paid
26 employees of the Defendants.

27 23. I understand the substantial burden I will have to undertake in order to represent the
28 non-exempt, hourly paid employees of the Defendants.

24. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class, and, even more importantly, to put an end to what I believe are illegal practices on the part of Defendants. I believe I have achieved both through this lawsuit and settlement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct this 08/25/2025 day of August 2025, at Los Angeles, California.



CORIELYN MARIE HALL