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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

ANDREE ALEMAN on behalf of herself, all others similarly situated, and on behalf of the general public, Plaintiffs, v. RETINA CONSULTANTS, SAN DIEGO, AN INCORPORATED MEDICAL GROUP; RCSD, INC.; and DOES 1-100, Defendants.	Case No. 25CU041637C [*Assigned for all purposes to the Honorable Gregory W. Pollack; Dept. C-71*] **DECLARATION OF PLAINTIFF ANDREE ALEMAN IN SUPPORT OF SETTLEMENT APPROVAL** Date Filed: August 8, 2025 Trial Date: None Set

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I, ANDREE ALEMAN, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for RETINA CONSULTANTS, SAN DIEGO, AN INCORPORATED MEDICAL GROUP and RCSD, INC. ("Retina Consultants") as a non-exempt, hourly employee from approximately May 30, 2023, to approximately May 2025.
4. Since becoming a class representative, I diligently worked on this case. I always answered phone calls from my attorneys or called them back promptly when they called. I also promptly responded to emails sent by my attorneys. On many occasions, I spoke with my attorneys for case related purposes. At the beginning of the case, I searched for and provided my attorneys with documents I received from Retina Consultants, such as wage statements I received during my employment. I assisted my attorneys in investigating the case. I have worked diligently to help progress the case.
5. I was aware that, at some point in this case, I would have my deposition taken. I knew that the deposition could take a full day and that I may have to meet with my attorneys prior to my deposition. I was at all times ready and willing to sit for my deposition.
6. Although I did not attend the mediation in person, I was available on the phone for all the negotiations, which I was kept apprised of and assisted in. I gave my consent to settle with Retina Consultants for the gross settlement amount of $400,000. I completely and carefully reviewed the Memorandum of Understanding ("MOU") and settlement agreement. I then signed the MOU and settlement agreement.
7. In light of the work I performed in this case and the duties associated with being a class representative in a case of this magnitude, I believe the $5,000 class representative enhancement payment is reasonable. I understand that this additional payment is not guaranteed and is subject to Court approval.

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8. I have and will continue to adequately represent all of the interests of the class. With my status as class representative, I will treat the interests of the Class above my interests.
9. My claims are typical of the Class Members because I am similarly situated to all hourly, non-exempt employees of Retina Consultants who worked in California at any time from August 8, 2021, to the date the Court grants preliminary approval. Thus, my interests are the same as all members of the proposed Class.
10. I recognize that any resolution of this matter must be approved by the Court in terms of whether the settlement is fair and reasonable, and that I am obligated to protect the interests of all of Class Members for the Class Period.

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

Dated: 5/29/2026

By: Signed by: Andree Aleman
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ANDREE ALEMAN