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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

SILVIA MARTINEZ, on behalf of herself and
all others similarly situated,

Plaintiff,

vs.

FAMILY HEALTH CARE CENTERS OF
GREATER LOS ANGELES, INC.; and DOES 1
through 100, inclusive,

Defendants.

Case No. 23STCV04109

CLASS ACTION

*[Assigned for all purposes to Hon.
Samantha Jessner, Dept. SSC-7]*

**DECLARATION OF SILVIA
MARTINEZ IN SUPPORT APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: July 15, 2025
Time: 10:00 a.m.
Dept.: SSC-7

Action Filed: February 24, 2023
Trial Date: None Set

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I, SILVIA MARTINEZ, declare as follows:

1. I am an individual over the age of 18 and am the named plaintiff in this matter against Family Health Care Centers of Greater Los Angeles, Inc. (“Family Health”). This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a former employee of Family Health, where I worked as a non-exempt employee for Family Health from approximately October 2019 to July 2022.

3. While working at Family Health, I believe that I was not paid all of the wages to which I was entitled, and that I did not receive all of my off-duty meal breaks and rest breaks. I also believe that I was not reimbursed for work-related expenses. As a result, I understand that I was not provided accurate wage statements and was not paid all wages owed to me at the end of my employment.

4. When I first discussed this case with my attorneys and agreed to move forward with this case, I understood that this lawsuit could benefit other Family Health employees by helping to recover unpaid wages and other penalties. I knew that filing a lawsuit carries risk, including the risk of being responsible for Family Health's costs if the case were lost. But I accepted this risk because I wanted to vindicate my and other Family Health employees' rights. Even though I understood that filing a lawsuit is a public record, and that this could potentially harm my reputation in the future, I accepted that burden in order to help other Family Health employees. I have also lost previous friendships developed with former co-workers from Family Health as a result of filing this lawsuit.

5. I have been actively involved in this case since I first had discussions with my attorneys at Abramson Labor Group about a potential class action back in February 2023. I have had many discussions with my attorneys throughout this case to discuss Family Health's policies and practices, identify potentially helpful documents and witnesses, and discuss case strategy. I spent significant time searching for my own documents, and I also spent time reviewing the

1 Settlement Agreement and other documents with my attorneys. I estimate that I have spent about
2 30-35 hours on this case from the time I first spoke with my attorneys regarding this case until
3 the present.

4 6. As part of the proposed Settlement, I understand that my attorneys will request
5 that the Court approve a service award of \$7,500 for my efforts on behalf of the Settlement Class.
6 I believe this amount is reasonable based on the amount of time and effort I have devoted to this
7 case as well as the risks I have undertaken as the class representative, as described above.

8 I declare under penalty of perjury under the laws of the state of California that the
9 foregoing is true and correct, and this declaration was executed by me on 05/16/25.

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12 
Silvia Martinez (May 16, 2025 14:18 PDT)

Silvia Martinez