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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

MARK JOHN SANTOS, individually, and on
behalf of other members of the general public
similarly situated; SAMANTHA SANCHEZ,
individually, and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiffs,

vs.

MEDZED, LLC, a Georgia limited liability
company; MEDZED PHYSICIAN
SERVICES, INC., a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 22STCV15585

Honorable Stuart M. Rice
Department SSC-1

CLASS ACTION

**DECLARATION OF MARK JOHN
SANTOS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Yasmin Hosseini); Declaration of
Proposed Class Representative (Samantha
Sanchez); and [Proposed] Order filed
concurrently herewith]

Date: June 12, 2024
Time: 10:30 a.m.
Department: SSC-1

Complaint Filed: May 10, 2022
FAC Filed: December 27, 2023
Trial Date: None Set

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I, **Mark John Santos**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by MedZed, LLC and MedZed Physician Services, Inc., (“Defendants”) as an hourly-paid, non-exempt employee from approximately March 2020 to approximately October 2020. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not paying their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 6 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 5 hours discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over 7 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff and class representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me throughout the litigation. I responded to them as quickly as possible and gave them as much information and identified as many

documents as I could. I spent at least 8 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendants.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 3 hours reviewing the settlement agreement and about 2 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me a service payment in the amount of \$5,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a service payment as well as my share of the settlement as a class member.

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

12/28/2023

Executed this ____ day of December 2023, at Long Beach, California

Electronically Signed
2023-12-28 18:43:33 UTC - 47.147.82.109
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Mark John Santos