

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

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 SAMANTHA
SANCHEZ 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 (Mark John
Santos); 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

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

20
21
22
23
24
25
26
27
28

28

1 and available to speak and meet with my attorneys whenever they needed me. I responded to
2 them as quickly as possible and gave them as much information and identified as many
3 documents as I could. I spent at least 6 additional hours speaking with my attorneys about the
4 case, identifying potential witnesses, providing my attorneys with documents and information
5 concerning the case, and also describing policies, practices, and procedures of Defendants.

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

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

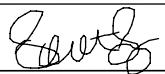
16 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

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

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

12/28/2023

23 Executed this ____ day of December 2023, at Calexico, California.

24 Electronically Signed

Nintex AssureSign® 465b4a7a-4362-44fa-b689-b0e6011c115d

25 Samantha Sanchez