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Attorneys for Plaintiff LEILA Z. DASTJERDI, on behalf
of herself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

LEILA Z. DASTJERDI, an individual, on
behalf of herself and others similarly
situated,

Plaintiff,

vs.

SOUTH COAST MEDICAL CENTER
FOR NEW MEDICINE, INC., a
California stock corporation, and DOES 1
through 50, inclusive,

Defendants.

Case No.: 30-2024-01375034-CU-OE-CXC

CLASS ACTION

Assigned for All Purposes To:

Hon. William Claster

Dept: CX-101

**DECLARATION OF LEILA Z.
DASTJERDI IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT
AGREEMENT**

Hearing Information:

Date: January 16, 2026

Time: 09:00 a.m.

Reservation: 74731499

Original Complaint Filed: January 22, 2024

FAC Filed: March 18, 2024

SAC Filed: September 5, 2025

Trial: none set

1 **DECLARATION OF CLASS REPRESENTATIVE LEILA DASTJERDI**

2 I, Leila Z. Dastjerdi, declare as follows:

3 1. I am a competent adult, over the age of eighteen, and the named Plaintiff
4 (“Plaintiff”) in the matter *Leila Z. Dastjerdi v. South Coast Medical Center For New Medicine,*
5 *Inc.* The following declaration is based on my personal knowledge and, if called as a witness, I
6 could and would competently testify thereto.

7 2. I submit this Declaration in support of the Motion for Preliminary Approval of the
8 Class Action and PAGA Settlement Agreement (“Settlement Agreement”) entered into between
9 myself and other similarly situated employees of Defendant South Coast Medical Center For
10 New Medicine, Inc. (“South Coast Medical” or “Defendant”), and Defendant (“Plaintiff and
11 Defendant are collectively referred to herein as “the Parties”).

12 3. I understand that I am submitting this Declaration in support of preliminary and
13 final Settlement approval in this action and my requested Class Representative Enhancement
14 Award (“Enhancement Award”) of \$10,000.

15 4. I worked for Defendant from approximately August 2021 to June 10, 2022, I
16 worked in Defendant’s facility located in Irvine, California.

17 5. I am familiar with the work involved in prosecuting the Class Action against my
18 former employer South Coast Medical. I have had numerous meetings with my attorneys. I am
19 familiar with the claims made, the mediation proceedings, and settlement discussions, and have
20 participated in all stages of the litigation up to and including preparation for preliminary approval
21 of the settlement on behalf of the class.

22 6. When I worked for Defendant, I was subjected to the same Labor Code claims
23 involving minimum wages, overtime wages, meal period violations, rest-break violations, wage
24 statements, record maintenance, timely wages upon termination, violation of Labor Code §§ 204,
25 221, and reimbursement of necessary business expenses as the other Settlement Class Members
26 (“Class Members”). From my experience and the documents and information I have reviewed, I
27 believe Defendant’s policies are or were uniformly applied to all hourly, non-exempt employees
28 who worked for Defendant in California. I believe I have been similarly situated with the other

1 Class Members as defined in the Settlement Agreement.

2 7. I understand that I am asking to be approved to serve as the Class Representative
3 for the Settlement Class in this action, which I understand is defined as “all persons currently or
4 formerly employed by Defendant, either directly or through any subsidiary, staffing agency, joint
5 venture or professional employer organization, as non-exempt, hourly-paid employees during the
6 Class Period in the State of California,” which is, “the period from January 22, 2020, through
7 July 14, 2025.” (Tran Decl., Exhibit 1, Settlement Agreement, ¶ 1.5, 1.12.) I also understand that
8 I am serving as the representative plaintiff on behalf of similarly aggrieved employees in
9 California in connection with the PAGA representative claims. I signed an acknowledgment of
10 my duties as a class representative at the outset of this action. I understood and believed that the
11 way that Defendant failed to pay me for my hours worked was the same as the way in which it
12 failed to pay all other employees who worked for Defendant.

13 8. I have and will continue to adequately represent the interests of all members of
14 the proposed class I seek to represent. My claims are typical of these Class Members and involve
15 the same common issues. I have no interests that are inconsistent with any of these Class
16 Members.

17 9. I have always considered the interests of the other Class Members just as I have
18 my own interests and understand that I must put the interests of the other Class Members before
19 my own. I have participated, and will continue to participate, in this lawsuit up to and through
20 the time of judgment. I have volunteered to represent the other Class Members because of the
21 importance of the case and so that other Class Members can benefit from the enforcement of the
22 law and the savings of time, money, and effort that come from settling this case on a class basis.

23 10. I believe that the settlement obtained on behalf of the settlement class is fair and
24 reasonable in view of the issues and risks involved with the case.

25 11. I believe that the Class Representative Service Payment of \$10,000 is fair and
26 reasonable. This payment takes into consideration the time, effort, risk, stress, and sacrifice
27 attendant to signing a general release of all claims in addition to wage and hour claims, as well as
28 the benefit provided to all Class Members as a result of my involvement in the case.

1 12. I have spent approximately 45 hours on this case. This includes the initial time I
2 devoted to investigating the claims and performing all work in relation to litigation, which has
3 continued for nearly two years. I have actively participated in each and every stage of the case,
4 including meeting with my attorneys during the intake process and case initiation; searching for
5 and producing documents responsive to Defendant's written discovery requests; preparing and
6 verifying my written discovery responses; participating in the Belaire-West Notice process;
7 preparing for and participating in full-day mediation; and completing all follow-up work with my
8 attorneys in relation to settlement. I have been diligent and acted accordingly in fulfilling my
9 duties as the class representative throughout all stages of the litigation. I will continue to do so,
10 including up to final approval of the settlement.

11 13. I believe that my interests have been and continue to be aligned with all Class
12 Members, and I have been and am willing to continue to pursue the Class Members' claims
13 vigorously on our collective behalf. As a result, I believe I do not have any interests that are
14 averse to those of the Class Members. I understood it was my responsibility to actively
15 participate in the lawsuit to safeguard the interests of other Class Members and to ensure that my
16 interests were not in conflict with those of the other employees. I did so to the best of my ability,
17 and I believe I have maintained the best interests of the Class Members.

18 14. I have actively participated in this litigation and have been updated on the
19 progress of the case. I provided documents to Class Counsel in support of the class claims and
20 spent hours discussing my claims and information regarding my employment by Defendant. I
21 have also invested significant time and effort in performing my duties on behalf of the Class,
22 including during the initial complaint drafting process, in response to formal discovery, and
23 informal discovery before mediation, speaking with Class Counsel about other witnesses and
24 answering questions in connection with the mediation and ongoing settlement negotiations, and
25 now throughout the preliminary and final Settlement approval process.

26 15. I have spent time communicating with Class Counsel to receive answers to my
27 questions or updates on the case's progress. I have devoted my time to this action and to
28 vigorously represent the interests of the Settlement Class, including by performing the following:

- 1 a. Researching the issues and claims I could bring against Defendant and
2 talking to my attorneys about initiating this action;
- 3 b. Being interviewed in detail by my counsel regarding the working
4 conditions that Class Members and I operated under for Defendant, and
5 particularly my experiences and the policies and practices that applied to
6 my employment and the employment of the other similarly situated
7 employees;
- 8 c. Searching for and gathering relevant documents in my possession and
9 providing them to my attorneys, and reviewing all documents produced by
10 Defendant;
- 11 d. Speaking with and informing my attorneys of the identities of potential
12 witnesses and Class Members and responding to questions from Class
13 Members and counsel and from Defendant in discovery in preparation for
14 mediation;
- 15 e. Searching for and producing documents, and working with my attorneys
16 in preparing and verifying my responses to Defendant's written discovery
17 requests;
- 18 f. Participating in the Belaire-West Notice process and preparing to assist
19 my attorneys for class certification;
- 20 g. Preparing for the mediation session and reviewing settlement-related
21 documents and working with counsel to prepare and provide executed
22 final versions of the MOU and the Settlement Agreement. I have also
23 worked with counsel in connection with the motion for preliminary
24 approval of the Settlement Agreement in drafting this Declaration and will
25 also do so as necessary in connection with final approval; and
- 26 h. Regularly receiving and responding to correspondence and phone calls
27 from my attorneys regarding the claims, case status, and then the
28 Settlement and other related documents.

1 16. Furthermore, I believed in this case and was willing to be a Class Representative
2 knowing the risks involved. I am not only giving up my wage and hour claims, but I am also
3 giving up all claims I have against my former employer. Since I have signed a general release for
4 any and all claims related to my employment with Defendant, I cannot pursue any other claims
5 against Defendant. In addition to the release of class claims alleged in the Operative First
6 Amended Complaint, I agreed to a general release of claims against Defendant to help secure the
7 Settlement on behalf of the Class.

8 17. This decision posed other risks for me, too, and I did not make the decision to
9 become involved in this class action lightly. I was concerned about the attention a publicly filed
10 lawsuit, and especially a class action, would attract. My name would be associated with a lawsuit
11 that I filed against my employer. I was aware that it is possible, and relatively easy, to perform
12 background checks of publicly filed documents on the internet, sometimes with nothing more
13 than a simple Google search. Attached as **Exhibit A** to this declaration is a true and correct copy
14 of the results of a search of “Leila Z. Dastjerdi v. South Coast Medical Center For New
15 Medicine, Inc.” entered on Google.com, accessed on December 16, 2025. I was mindful that
16 prospective employers might find out that I sued a former employer, and that this could hurt my
17 employability in the future. I believed in this case and was willing to be a Class Representative
18 Plaintiff knowing the risks involved.

19 18. I have chosen to serve as a class representative despite my concerns about how
20 my role in this class action may adversely affect my prospects for future employment given that
21 this class action is public information accessible by prospective employers.

22 19. I have reviewed with my counsel the Settlement Agreement we have negotiated
23 with Defendant in this action on behalf of the Class Members. I agreed to the terms because I
24 believe the Settlement is fair and reasonable. I understand that once the Court grants preliminary
25 approval of the Settlement and to me serving as the class representative, the action will proceed
26 with Settlement administration and then the final approval process.

27 20. I have not yet received any consideration or promises that are different than any
28 of the other Class Members. In my opinion, the requested Enhancement Award of \$10,000 is fair

1 and reasonable given the risks I have taken, the tasks I have performed, the time I have invested,
2 and the real benefit that the Class Members will receive from the Settlement.

3 21. I understand my requested \$10,000 Enhancement Award is subject to the Court's
4 final approval and discretion, and I respectfully request that the Court approve awarding it and
5 approve me to serve as the class representative for settlement purposes.

6 22. This litigation has resulted in a valuable benefit to the Class Members who will
7 participate in the monetary payout of this Settlement because of my involvement. Further, Class
8 Members who are current employees will benefit from the policy changes that Defendant will
9 now make because of the Settlement.

10 23. Based on the time, risk, stress, sacrifice of signing of a general release, and the
11 great outcome of this and monetary payout, I believe that the requested service payment is fair
12 and reasonable. As such, I respectfully request that the Court award the requested Enhancement
13 Award of \$10,000.

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

16 Executed on December 16, 2025 at Irvine, California

17 Signed by:


18 94EDB83D1A2F40B...

19 Leila Z. Dastjerdi