

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
Rachel Newman (State Bar #350826)
Jennifer Gerstenzang (State Bar #279810)
Jaclyn Joyce (State Bar #285124)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619)255-9047
shani@zakaylaw.com
jackland@zakaylaw.com
rachel@zakaylaw.com
jenny@zakaylaw.com
jaclyn@zakaylaw.com

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

LISA MARTINI and ISIAIAH MA, as
individuals, and on behalf of other members
of the general public similarly situated;

Plaintiff,

vs.

SAN FERNANDO VALLEY COMMUNITY
MENTAL HEALTH CENTER,
INCORPORATED, a California corporation;
SAN FERNANDO VALLEY COMMUNITY
HEALTH, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 23STCV00900

**DECLARATION OF ISIAIAH MA
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: June 30, 2025

Time: 9:00 a.m.

Judge: Hon. Elihu M. Berle

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DECLARATION OF ISAIAH MA

I, Isaiah Ma, declare as follows:

1. I'm over 18, living in California, and I'm one of the Plaintiffs and Proposed Class Representatives in this case. I'm submitting this declaration in support of the Motion for Final Approval of the Class Action and PAGA Settlement, as well as the request for attorneys' fees and my service award. Everything I'm saying here is based on my personal knowledge, and if called to testify, I could do so truthfully and competently.

2. I first got in touch with Class Counsel in November 2022 and filed a PAGA lawsuit in June 2023.

3. I was employed by Defendant from April 2022 to November 2022, working in a non-exempt, hourly position. That means I was legally entitled to overtime pay, meal and rest breaks, and reimbursement for certain business expenses, among other protections.

4. I decided to move forward with this case because I believed Defendant didn't follow the labor laws – not just with me, but with many of my co-workers too. I believe we weren't paid for all the time we worked, weren't provided proper breaks, weren't reimbursed for necessary work expenses, and didn't receive accurate wage statements.

5. Before the case was filed, I had several in-depth conversations with my attorneys. We discussed my work history, the company's policies, and how those policies affected me and others. I shared documents, answered questions, and learned about the litigation process and what it means to represent a class of workers.

6. I also came to understand the risks of stepping into the spotlight as a class/PAGA representative. If we had lost, I could've been on the hook for attorneys' fees or costs. I knew I'd be under more scrutiny and that I'd have to make decisions with the class's interests in mind—not just my own.

7. Despite all that, I moved forward because I knew most people wouldn't feel safe or supported enough to speak up—especially against an employer. If no one takes that step, nothing changes.

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2 8. Throughout the case, I've stayed involved. I kept in regular contact with my attorneys,
3 read case updates and filings, and remained engaged in strategy and settlement discussions.

4 9. We had mediation on November 1, 2023. While I wasn't physically there, I was
5 available by phone and actively participated before, during, and after the session. I reviewed the
6 settlement terms, signed the Memorandum of Understanding on November 14, 2023, and later signed
7 the full settlement agreement on February 12, 2024. I'm pleased with the result—we reached a fair
8 and meaningful resolution.

9 10. As part of my role, I agreed to release all my potential claims against Defendant—
10 including claims I may not even be aware of—under the broad general release terms. This goes
11 beyond what regular class members are releasing. I'm not giving up any claims that arise after the
12 class period, or things like workers' comp or unemployment. Just the full scope of claims related to
13 my employment during the class period.

14 11. I estimate I've spent about 15 to 20 hours on this case, though I didn't track it to the
15 minute. I've been consistently engaged and available to support the litigation and settlement process.

16 12. Given the time I've invested, the risk I accepted, and the release I've agreed to, I
17 believe the requested \$10,000 Class Representative Payment is fair and well-deserved. I also support
18 Class Counsel's for attorneys' fees and expenses, and I'm on board with the proposed fee allocation
19 among Zakay Law Group, JCL Law Firm, Lawyers for Justice, and Starpoint LC.

20 13. At the end of the day, I'm proud of what we achieved. I hope this case helps ensure that
21 other employees are treated fairly in the future, and I'm grateful I had the opportunity to represent the
22 class.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is
24 true and correct. Executed this 8th day of April 2025, at Los Angeles, California.

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26 By:  Isaiha Ma Apr 8, 2025 13:29 PDT
27 ISIAHA MA
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