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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

GINA MARTINEZ, ISMAEL ORTEGA,
JESSICA SAELOR, as individuals, on behalf
of themselves and others similarly situated,

Plaintiffs,

v.

MOBILE-MED WORK HEALTH
SOLUTIONS, INC.; and DOES 1 thru 50,
inclusive,

Defendants.

CASE NO.: **23CV410264**

**DECLARATION OF LISA B.
ITURRIAGA IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: August 28, 2024
Hearing Time: 1:30 p.m.

Judge: Hon. Theodore C. Zayner
Dept.: 19

Action Filed:
Trial Date: Not set

DECLARATION OF LISA B. ITURRIAGA

1 I, Lisa B. Iturriaga, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all of the courts of the State of
3 California. I am an associate with Aegis Law Firm, PC (“Aegis”), counsel for Plaintiff in this
4 matter. I am thoroughly familiar with and have personal knowledge of all of the facts set forth
5 herein.

6 2. I submit this declaration in support of Plaintiff’s Motion for Preliminary
7 Approval of Class Action Settlement. If called as a witness, I could and would competently
8 testify thereto.

9 **Counsel’s Qualifications**

10 3. Aegis Law Firm prosecutes wage and hour cases, including class actions on
11 behalf of employees and others who have had their rights violated. Aegis, either on its own, or
12 with co-counsel is currently serving as plaintiffs’ counsel of record in dozens of wage and hour
13 and employment class action cases pending in both state and federal court.

14 4. The attorneys working on this case have been appointed class counsel in many
15 cases, through both contested motions and settlement approval motions.

16 5. Aegis has litigated and successfully resolved many wage and hour class action
17 cases involving failure to pay wages and derivative Labor Code claims and penalties. *See, e.g.,*
18 *Roman, et al. v. TRM Manufacturing, Inc.*, Riverside Superior Court, Case No. RIC1706458 (class
19 certification granted on December 17, 2020 for all current and former non-exempt workers’ on
20 issues of rounding, meal period, and rest period claims); *Gamboa v. Kamran, et al.*, San
21 Bernardino Superior Court, Case No. CIVDS1605273 (class certification granted on September
22 16, 2019, for factory workers on issues of rounding, automatic deduction of first meal period, and
23 second meal period); *Romo, et. al, v. GMRI, Inc. d/b/a/ Olive Garden*, United States District
24 Court Central District of California, Case No. EDCV-12-0715-JLQ (class certification granted
25 for restaurant workers’ rest period claims); *Sawyer v. Retail Data, LLC*, Orange County Superior
26 Court, Case No. 30-2014-00753767-CU-OE-CXC (unpaid wage and rest break claims for piece
27 rate workers); *Gonzalez v. SFFI Company, Inc., et. al*, San Bernardino County Superior Court,

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DECLARATION OF LISA B. ITURRIAGA

1 Case No. CIV DS1504287 (unpaid wages, meal period and rest break claims for non-exempt
2 employees); *Antoine v. Riverstone Residential California, Inc., et. al*, Sacramento County
3 Superior Court, Case No. 34-2013-00155974 (rate of pay, on-call time, unpaid wage, meal
4 period, rest break, and expense reimbursement claims for non-exempt employees); *Nguyen v.*
5 *Pharmerica*, Orange County Superior Court, Case No. 30-2014-00716072-CU-OE-CXC (unpaid
6 wages and unreimbursed expenses for pharmacists); *Orellana v. Westlake*, Los Angeles County
7 Superior Court, Case No. BC539614 (unpaid overtime, meal period and rest break claims for
8 call center employees); *Kent v. Mountain View Child Care, Inc.*, Los Angeles County Superior
9 Court, Case No. BC539633 (minimum wage, overtime, meal period, and rest break claims for
10 hospital workers); *Durroh v. East West Bank*, Los Angeles County Superior Court, Case No.
11 BC528860 (overtime claims for failure to include bonuses in regular rate of pay for bank
12 workers); *O'Brien et al. v. Pizza Hut of Southeast Kansas, Inc. et al.*, Riverside County Superior
13 Court, Case No MCC 1301030 (meal period and expense reimbursement claims for delivery
14 drivers); *Bell v. Prime Healthcare*, Orange County Superior Court, Case No. 30-2011-
15 00475240-CU-OE-CXC (overtime claims for failure to include shift premiums in regular rate of
16 pay and failure to provide meal and rest periods to hospital workers), *Grana v. Toys R US-*
17 *Delaware, Inc.*, Central District of California, Case No. 2:13-cv-01302-DSF-JCG (bag check
18 claims for unpaid wages and failure to provide meal periods and rest breaks to retail employees);
19 *Mendez v. H.J. Heinz Company, L.P., et. al*, Orange County Superior Court, Case No. 30-2013-
20 00644915-CU-OE-CXC (failure to pay all wages to factory workers due to rounding practice);
21 *Fresh & Easy Wage and Hour Cases*, Los Angeles Superior Court, Cas No. JCCP 4705 (failure
22 to provide meal and rest periods to supermarket workers); *Lunsford v Stater Bros.*, Riverside
23 Superior Court, Case No. RIC 1104475 (failure to provide meal and rest periods to supermarket
24 workers); *Gregg v. Belo*, Riverside Superior Court, Case No. RIC 523697 (unpaid wages and
25 missed meal and rest periods due to misclassification of newspaper delivery employees); *Brown*
26 *v. Experian Information Solutions, Inc., et. al.*, Orange County Superior Court, Case No. 30-
27 2012-00375163 (misclassification of engineers and similar positions); *Tereth v. Shakey's USA*,

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DECLARATION OF LISA B. ITURRIAGA

1 *Inc.*, Los Angeles Superior Court, Case No. BC441359 (failure to provide meal and rest periods
2 to restaurant employees); *Azurin v. Harbor Distributing LLC, et. al.*, Los Angeles Superior
3 Court, Case No. BC421392 (failure to pay overtime wages, provide meal and rest periods,
4 reimburse business expenses to Account Managers); *Caffero v. ABC* (failure to provide meal
5 periods and reimburse expenses of therapists). All cases cited above were successfully resolved
6 for the plaintiff classes.

7 6. Kashif Haque received his J.D. in 2001 from Washington University School of
8 Law. While in law school, Mr. Haque was a member of the Law Review Editorial Board, author
9 of an article published in the Law Review, Executive Board Member of Moot Court, and a
10 member of the Dean's List. He received a Bachelor's of Science in Business Administration
11 from the University of Central Missouri in 1998, where he was a member of the Beta Alpha Psi
12 honors fraternity.

13 7. Since 2004, Mr. Haque has exclusively focused his practice on plaintiff's
14 employment litigation with a specific focus on wage and hour claims. Since then, he has
15 represented over 500,000 employees with their employment claims, many of which included
16 wage and hour claims. He has been appointed class counsel in approximately 100 cases and is
17 currently litigating over 150 employment wage and hour class action cases.

18 8. Mr. Haque authored a book on employment litigation strategies with West
19 Publishing and has been invited to speak on class action and wage and hour issues on numerous
20 occasions. He has spoken at seminars by the State Bar of California, California Employment
21 Lawyer's Association (CELA), Orange County Bar Association, and various other CLE
22 providers. Mr. Haque is the former Chair for the Labor and Employment Section of the Orange
23 County Bar Association. He was selected as one of the Top 50 Attorneys in Orange County by
24 Super Lawyers for 2017 and 2019. He has been a Super Lawyer for every year from 2009 to the
25 present. OC Register/Metro has selected him as one of the Top 5 Employment Lawyers in
26 Orange County for every year the list was published, from 2012 to 2018.

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DECLARATION OF LISA B. ITURRIAGA

9. Samuel A. Wong is a graduate of University of Pennsylvania Law School, where he received his J.D. in 2001. Mr. Wong received a Bachelors of Arts in Sociology from the University of California at Berkeley in 1997.

10. After graduation from law school in 2001, the same year in which Mr. Wong took and successfully passed the California Bar Exam, Mr. Wong moved to back to Los Angeles, California where he was employed at Paul Hastings, Janofsky & Walker, LLP. While working in the employment department at Paul Hastings, he was involved in numerous wage and hour class action lawsuits and other employment related matters.

11. Mr. Wong became a founding partner of Aegis Law Firm, PC in 2003, and focused his practice on plaintiff's side employment work. Throughout his years of practice, Mr. Wong represented and obtained successful outcomes for his clients, including awards through arbitration and trial.

12. Mr. Wong is a member of the Orange County Bar Association, Orange County Trial Lawyers Association, and California Employment Lawyers Association.

13. Mr. Wong was chosen by Law and Politics Magazine as a Super Lawyer Rising Star, representing one of the top 2.5% of lawyers under 40 in Southern California in 2011, 2012, 2013, and 2014. He was chosen by Law and Politics Magazine as a Super Lawyer in 2015, 2016, 2017, and 2018. Mr. Wong was also chosen as a Top Attorney in the field of employment law by OC Metro in 2014, 2015, and 2018.

14. Jessica L. Campbell is a partner at Aegis Law Firm. Ms. Campbell was admitted to the California Bar in December of 2011, and received her J.D. from Santa Clara University School of Law and her B.A. from the University of California, Berkeley. Ms. Campbell has dedicated her career to plaintiffs' side class actions. Ms. Campbell's experience includes successful work on class action appeals, class certification motions, and class settlements. She was chosen by Law and Politics Magazine as a Super Lawyer Rising Star, representing one of the top 2.5% of lawyers under 40 in Southern California in 2018-2021.

DECLARATION OF LISA B. ITURRIAGA

15. I am an associate at Aegis Law Firm. I am a graduate of Chapman University Fowler School of Law, where I received my J.D. in 2020 and was admitted to the California Bar in 2021. I received my B.S. from the University of South Florida in 2016. Prior to joining Aegis Law Firm, I worked at an insurance defense firm.

16. Aegis Law Firm has performed significant work and expended litigation costs in prosecuting the matter with no guarantee of any payment.

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

Executed on July 25, 2024 at Irvine, California.

Lisa B. Iturriaga
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