

KINGSLEY & KINGSLEY, APC

ERIC B. KINGSLEY, Esq. (SBN 185123)

eric@kingsleykingsley.com

KELSEY M. SZAMET, Esq. (SBN 260264)

kelsey@kingsleykingsley.com

16133 Ventura Blvd., Suite 1200

Encino, CA 91436

Tel: (818) 990-8300, Fax (818) 990-2903

BENJAMIN J. SMITH, Esq. (SBN 266712)

benjy@thesmithlawcorp.com

SMITH LAW

8605 Santa Monica Blvd PMB, 97638

West Hollywood, CA 90069

Tel: (818) 839-9607

Attorneys for Plaintiff GINA MARTINEZ and the Proposed Class

[Additional Counsel Listed on the Following Page]

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 GINA MARTINEZ
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: August 28, 2024

Time: 1:30 P.M.

Dept.: 19

Judge: Theodore C. Zayner

SAC Filed: June 25, 2024

Trial Date: None Set

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

Nicholas J. De Blouw (State Bar #280922)

Christine T. LeVu (State Bar #288271)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858)551-1223

Facsimile: (858) 551-1232

Website: bamlawca.com

Attorneys for Plaintiff ISMAEL ORTEGA and the Proposed Class

AEGIS LAW FIRM, PC

SAMUEL A. WONG (State Bar No. 217104)

KASHIF HAQUE (State Bar No. 218672)

JESSICA L. CAMPBELL (State Bar No. 280626)

LISA B. ITURRIAGA (State Bar No. 339678)

9811 Irvine Center Drive, Suite 100

Irvine, CA 92618

Tel: (949) 379-6250

Fax: (949) 379-6251

jcampbell@aegislawfirm.com

liturriaga@aegislawfirm.com

Attorneys for Plaintiff JESSICA SAELOR and the Proposed Class

DECLARATION OF GINA MARTINEZ

I, GINA MARTINEZ, state and declare as follows:

1. I am a competent adult, over the age of eighteen and a named Plaintiff in the above-captioned action. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, in support of my qualifications as named Plaintiff, and in support of the Motion for Preliminary Approval of Class and Representative Action Settlement. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I am a former non-exempt employee of Defendant Mobile-Med Work Health Solutions, Inc. ("Defendant" or "Mobile-Med").

3. I performed work as an hourly employee for Mobile-Med from approximately March 2022 to September 2022, earning approximately \$22/hour.

4. Before filing the class action complaint against Mobile-Med on January 19, 2023, I researched and identified experienced Counsel that I believed could best represent the interests of the Class members. I also assisted the attorneys with investigation and gathering of information including providing all relevant employment documents in my possession, discussing my work experience, and providing information regarding the experience of others that I had observed while working for Mobile-Med.

5. I also reviewed the terms of the proposed settlement before signing it. My attorneys explained the specifics of how the settlement would work and I accepted the settlement only after I had spent time evaluating the proposed outcome to assure that it was fair. Based on my attorneys' evaluation and recommendation, and my own review, I believe the settlement is fair and reasonable and adequately compensates settlement Class members.

6. I believe that I have always put the Class members interests ahead of my own interests at all times during this litigation.

7. I also am aware and understand that I have agreed to sign a broader release of the claims than the release applicable to the Class members in reaching the Settlement.

1 8. Throughout the entirety of this litigation, I have maintained regular contact with
2 Class Counsel and assisted in any way possible by providing information and making myself
3 available as needed.

4 9. When the class action notice is mailed out, I plan to make myself available as
5 necessary to ensure that Class members were aware of the lawsuit and its progress and how to be
6 a part of it.

7 10. I have always kept the Class members interests at heart in this litigation. I am
8 prepared to continue assisting with this litigation and am committed to achieving the best possible
9 results for the Class members.

10 11. I believe that the class action settlement obtained on behalf of the Class members
11 is fair and reasonable in light of the issues involved in this case and in the best interest of the class.
12 As mentioned above, I reviewed and discussed the Settlement Agreement with my attorneys and
13 asked them questions about it to ensure that I understood its terms and what it would mean for all
14 of the class members.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed this 29 day of JULY, 2024
17 at Victorville, California. (City)
18 (State)

DocuSigned by:



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Gina Martinez
Declarant