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Attorneys for Plaintiff and the proposed class

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

IRMA MARTINEZ-MONTANO, an
individual, on behalf of herself and others
similarly situated

PLAINTIFF,

v.

NORTH VALLEY BEHAVIORAL HEALTH,
LLC; and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. CVCS23-0000676

[Case Assigned for All Purposes to Hon. Perry
Parker in Courtroom 1]

**DECLARATION OF IRMA MARTINEZ-
MONTANO IN SUPPORT OF FINAL
APPROVAL OF CLASS SETTLEMENT**

Date: January 26, 2026
Time: 9:00 AM
Courtroom: 1

Complaint Filed: April 12, 2023
Trial Date: None Set

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DECLARATION OF IRMA MARTINEZ-MONTANO

I, Irma Martinez-Montano, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant North Valley Behavioral Health, LLC (“Defendant”) as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that Defendant did not pay all wages and/or overtime due, failed to provide all meal and/or rest breaks as required, failed to provide accurate itemized wage statements, and failed to pay all wages due at the time of resignation/termination to me and other employees.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched attorneys who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed in April 2023.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys’ various communications regarding this matter, making myself available for a full-day mediation in May 2024; preparing for my deposition, and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

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1 7. I estimate the total time spent in connection with this matter is approximately 25-
2 35 hours.

3 8. I believe that I have worked to actively represent the other Class Members and their
4 interests. I have always kept the Class Members interests at heart in this litigation.

5 9. I am prepared to continue assisting with this litigation and am committed to
6 achieving the best possible results for the Class.

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

11 11. I believe that I have fairly represented the absent Class and request that the Court
12 finally approve this settlement and confirm me as Class Representative.

13 12. I am not aware of any conflicts of interest that prevent me from being confirmed as
14 Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other
15 member of the firm that is representing me. I have no business dealings or other involvement
16 beyond this lawsuit and this representation. I have not been promised any money or inducement
17 to serve as Class Representative in this Lawsuit.

18 13. It is my opinion that the settlement agreement provides for a fair and adequate
19 enhancement for me in my role stepping forward as the Class Representative, in the amount of
20 \$7,500.00. I believe that this is fair and reasonable in light of all of the work that I have performed
21 in my role as Class Representative. As Class Representative, I have actively participated in all
22 stages of the litigation, as detailed above, and have always maintained the best interests of the
23 Class while performing my Class Representative duties.

24 14. It is also my opinion that the Class Representative enhancement is fair, reasonable,
25 and adequate because, in addition to the many hours spent participating in the prosecution of this
26 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
27 were unsuccessful in this Lawsuit. Likewise, I risk the potential stigma of being a Class
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1 Representative in a class action labor dispute, which may affect my future employability.
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3 I declare under penalty of perjury under the laws of the State of California that the foregoing
4 is true and correct.

5 Executed this 26 day of December, 2025 at Marysville,
6 California. (City)

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8 Irma Martinez-Montano
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On December 29, 2025, I served all interested parties in this action the following documents described as: **DECLARATION OF IRMA MARTINEZ-MONTANO IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

FERBER LAW, A Professional Corporation
Michelle Ferber, Esq.
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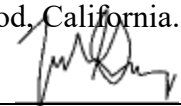
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Attorneys for Plaintiff

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 29, 2025, at West Hollywood, California.



Taylor Gregg