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Attorneys for *Plaintiff*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JEANNETTE SANCHEZ, individually, on
behalf of all others similarly situated, and on
behalf of the State of California and other
aggrieved persons,

Plaintiff,

v.

LAKEWOOD EYE PHYSICIANS AND
SURGEONS, INC., A MEDICAL GROUP, a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 23STCV11175

Assigned for all purposes to:
Hon. Theresa M. Traber
Dept. 1

**DECLARATION OF PLAINTIFF
JEANNETTE SANCHEZ IN SUPPORT
OF MOTION FOR FINAL APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

FINAL APPROVAL HEARING

Date: April 17, 2026
Time: 10:30 a.m.
Dept.: 1

I, Jeannette Sanchez, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Final Approval of Class Action and PAGA Settlement.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

2. When I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendant Lakewood Eye Physicians and Surgeons, Inc., a Medical Group (“Defendant”) and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Defendant, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner’s office.

3. I was also made aware that being a class representative and private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a class representative and private attorney general, I might be responsible for some or all of Defendant’s legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

4. I understood that there were risks involved in class and representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

5. As the named plaintiff, I am the face of the litigation. Additionally, the class notice that was mailed in this case was sent to 193 current and former employees of Defendant. The notice informed all of these employees that I filed a class and representative action against Defendant. Exposing myself to this kind of publicity creates a risk for my future career prospects, since current and former employees of Defendant may move to different companies within the industry or may

know people at other companies within the industry who may not want to hire someone who sued her employer.

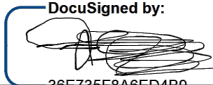
Amount of Time and Effort Spent and Duration of the Litigation

6. I have spent a substantial amount of time and effort on this litigation. My work on this case has included, among other things, gathering and providing my payroll records and other documents, discussing potential witnesses, discussing and assisting my attorneys with their opposition to Defendant's motion to compel arbitration, reviewing discovery information and data, assisting my attorneys prepare for mediation by discussing my claims and experience, being on-call for my attorneys on the date of mediation should any questions or concerns arise, and participating in settlement discussions. After mediation, I remained actively involved by reviewing the settlement papers and regularly contacted my counsel for updates. I estimate that since I retained my counsel in October 2022 (over 3 years ago), I have spent approximately 45 hours on the activities described above. I anticipate I will spend an additional 1-2 hours after the Final Approval wrapping up this Action.

Personal Benefit Received as a Result of the Litigation

7. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, I have signed a general release for Defendant. The other employees are only releasing the wage and hour claims asserted in the lawsuit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 3/25/2026, at Los Angeles, California.

DocuSigned by:

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 JEANNETTE SANCHEZ