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Attorneys for Plaintiff and the proposed class

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

ERNESTINE JIMENEZ, an individual, on
behalf of herself and others similarly situated

PLAINTIFF,

v.

MOM365 NEWBORN PHOTOGRAPHY; and
DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. CV-23-003097
[Consolidated with Case No. CV-23-004587]

[Case Assigned for All Purposes to Hon. John
R. Mayne in Dept. 21]

**DECLARATION OF ERNESTINE
JIMENEZ IN SUPPORT OF FINAL
APPROVAL OF CLASS SETTLEMENT**

Date: February 18, 2026
Time: 8:30 AM
Dept.: 21

Complaint Filed: June 2, 2023
Trial Date: None Set

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DECLARATION OF ERNESTINE JIMENEZ

I, Ernestine Jimenez, 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 Mom365 Newborn Photography (“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, failed to provide compliant paid rest periods, failed to reimburse for business-related expenses, 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 similarly situated employees and I believe that I am able to represent them well.

5. I first researched experienced 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 class action lawsuit was filed in June 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, attending a full-day mediation in January 2025; 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.

7. I estimate the total time spent in connection with this matter is approximately 20-25 hours.

1 8. I believe that I have worked to actively represent the other Class Members and their
2 interests.

3 9. I have always kept the Class Members interests at heart in this litigation.

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

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

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

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

17 14. It is my opinion that the settlement agreement provides for a fair and adequate
18 enhancement for me as a Class Representative, in the amount of \$5,000.00. I believe that this is
19 fair and reasonable in light of all of the work that I have performed in my role as Class
20 Representative. As Class Representative, I have actively participated in all stages of the litigation,
21 as detailed above, and have always maintained the best interests of the Class while performing my
22 Class Representative duties.

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15. It is also my opinion that the Class Representative enhancement is fair, reasonable, and adequate because, in addition to the many hours spent participating in the prosecution of this case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we were unsuccessful in this Lawsuit. Likewise, I risk the potential stigma of being a Class Representative in a class action labor dispute, which may affect my future employability.

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

Executed this 6 day of January, 2026 at Riverbank,
California. (City)

Ernst

Ernestine Jimenez

(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 January 15, 2026, I served all interested parties in this action the following documents described as: **DECLARATION OF ERNESTINE JIMENEZ IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

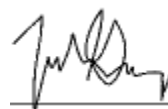
Gordon Rees Scully Mansukhani, LLP Jennifer Jambor-Delgado Debra Ellwood Meppen Rebecca Marsden Delia Guerrero jjambordelgado@grsm.com rmarsden@grsm.com dmeppen@grsm.com dmguerrero@grsm.com 633 W. Fifth., 52nd Floor, Los Angeles, CA 90071 cc : mtabizon@grsm.com Attorneys for Defendant	ABRAMSON LABOR GROUP WILLIAM ZEV ABRAMSON, Esq. wza@abramsonlabor.com 1700 W Burbank Blvd, Burbank, CA 91506 Attorneys for Plaintiff
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[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 January 15, 2026, at West Hollywood, California.



Taylor Gregg