

**KINGSLEY SZAMET
EMPLOYMENT LAWYERS**
ERIC B. KINGSLEY, Esq. (SBN 185123)
eric@kingsleylawyers.com
KELSEY M. SZAMET, Esq. (SBN 260264)
kelsey@kingsleylawyers.com
JESSICA BULAON, Esq., (SBN 340749)
jessi@kingsleylawyers.com
16133 Ventura Blvd., Suite 1200
Encino, CA 91436
Tel: (818) 990-8300, Fax (818) 990-2903

ABRAMSON LABOR GROUP
WILLIAM ZEV ABRAMSON, Esq. (SBN 289387)
Wza@abramsonlabor.com
3580 Wilshire Blvd., Ste 1260
Los Angeles, CA 90010-2513
Tel: (213) 493-6300, Fax (213) 382-4083

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 PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS SETTLEMENT**

Date: August 19, 2025
Time: 8:30 A.M.
Dept.: 21

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

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I, Ernestine Jimenez, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the Class Representative Plaintiffs in the matter of ERNESTINE JIMENEZ, an individual, on behalf of herself and others similarly situated v. Mom365 Newborn Photography; and DOES 1 thru 50, inclusive, Stanislaus County Superior Court, Case No. CV-23-003097. 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, and in support of my qualifications as Class Representative. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as a newborn photographer for Mom365 Newborn Photography (“Mom365” or “Defendant”).

3. In my role as a newborn photographer, I regularly did not receive proper wages and overtime pay, minimum wages, paid rest periods, reimbursed expenses, accurate itemized wage statements, and all wages due at the time of termination or resignation.

4. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, in June 2023, I researched and identified 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 discussing my work experience and the experience of others that I had observed while working for Mom365 and provided all relevant employment documents in my possession. In addition, I made myself available for a full-day mediation on January 14, 2025. While at the Mediation, I actively participated in the discussions with the Class Counsel and shared my knowledge and insights in order to help the Class obtain a favorable settlement.

5. While I did not maintain contemporaneous time records, I estimate I have spent between 15-20 hours on the activities above.

6. Throughout the entirety of this litigation, I have maintained regular contact with Class Counsel and assisted in any way possible by providing information and making myself

1 available as needed.

2 7. I was aware that by helping to initiate this lawsuit, my name would become known
3 and it was possible that my involvement in this matter could make it more difficult for me to obtain
4 employment in this field. Regardless, I believed it was important to proceed with this matter on
5 my behalf and on behalf of all others who were subject to the same problems during their
6 employment with Mom365.

7 8. Based upon my participation in this case, I understand the merits of this settlement
8 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
9 of the class. I believe this Settlement will benefit the Class.

10 9. It is my opinion that a fair and adequate Class enhancement for me as a Class
11 Representative is \$5,000.00. I believe that it is fair and reasonable in view of all of the work I have
12 performed in my role as a Class Representative. As Class Representative, I actively participated
13 in all stages of the litigation as detailed above and have always maintained the best interest of the
14 Class while performing my Class Representative duties.

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

17 Executed this 01 day of july, 2025 at Riverbank,
18 California. (City)

19
20 

21 Ernestine Jimenez
22 Declarant
23
24
25
26
27
28

(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 July 10, 2025, I served all interested parties in this action the following documents described as: **DECLARATION OF ERNESTINE JIMENEZ IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY 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 <i>Attorneys for Defendant</i>	ABRAMSON LABOR GROUP WILLIAM ZEV ABRAMSON, Esq. wza@abramsonlabor.com 1700 W Burbank Blvd, Burbank, CA 91506 <i>Attorneys for Plaintiff</i>
---	--

[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/414>) 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 above 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 July 10, 2025, at Chino, California.



Leslie Sanchez