Docusign Envelope ID: 128B44E4-ACEF-8A89-824B-F75640013D7E

Benjamin H. Haber (SBN 315664)
benjamin.haber@wilshirelawfirm.com
Daniel J. Kramer (SBN 314625)
daniel.kramer@wilshirelawfirm.com
Chase M. Stern (SBN 290540)
chase.stern@wilshirelawfirm.com
Karen L. Wallace (SBN 272309)
karen.wallace@wilshirelawfirm.com
**WILSHIRE LAW FIRM, PLC**
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SAN DIEGO**

ANDREA URIAS and BRITTANY JOHNSON, individually, on behalf of all others similarly situated, the State of California, and other aggrieved persons,

Plaintiffs,

v.

LABCORP PERI-APPROVAL AND COMMERCIALIZATION INC., an unknown entity; COVANCE MARKET ACCESS SERVICES, INC., a corporation; COVANCE INC., a corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 37-2023-00027719-CU-OE-CTL

*[Assigned for all purposes to the Hon. Carolyn M. Caiettie, Dept. C-70]*

**DECLARATION OF ANDREA URIAS IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

Preliminary Approval Hearing:
Date: July 23, 2027
Time: 10:30 a.m.
Dept.: C-70
Reservation Number: 105930
Complaint Filed: June 30, 2023
Trial Date: None set

Docusign Envelope ID: 128B44E4-ACEF-8A89-824B-F75640013D7E

**DECLARATION OF ANDREA URIAS**

I, Andrea Urias, hereby declare as follows:

1. I am an adult resident of San Diego County, California, and a named plaintiff in the instant matter. All matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief, which I believe to be true. If called as a witness in this action, I could and would testify truthfully to the matters described here.

2. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

3. I was an hourly-paid, non-exempt employee of Defendants LabCorp Peri-Approval and Commercialization Inc., Covance Market Access Services, Inc., Covance Inc. ("Defendants") from approximately February 2019 to July 2022.

4. I believe Defendants' policies regarding work conditions were the same for me as they were for all other non-exempt employees ("Class Members"). Based on my work experience and familiarity with Defendants' employment practices, I worked with my attorneys to bring claims against Defendants on behalf of myself and other Class Members.

5. I wanted to serve as a class representative in this case because I believe my experiences are the same as, or substantially similar to, other Class Members. We were all subject to the same uniform employment policies and practices, and, as a result, we all suffered the same or similar injuries.

6. My interests as a named plaintiff in this case are not adverse to the interests of the Class. I am seeking the same recovery for other Class Members as for myself, which is compensation for unpaid wages, penalties, and interest that are owed to us by Defendants.

7. I do not have any conflicts with other Class Members that would interfere with my ability to represent them and believe I can, and will, adequately represent their interests.

8. When I decided to initiate a lawsuit as a class representative and as a private attorney general for the State of California, I understood that I was seeking unpaid wages and penalties not only for myself, but also for other Class Members. I also understood that, by doing so, I could be giving up more immediate recovery available through the Labor Commissioner's office

Docusign Envelope ID: 128B44E4-ACEF-8A89-824B-F75640013D7E

9. I was made aware that filing a lawsuit as a class representative and private attorney general could subject me to unwanted and negative attention. For example, the class notice in this case will be mailed to approximately 758 Class Members, informing them that I filed class and representative actions against Defendants. The scope of this disclosure creates a risk for my future career prospects, given that these Class Members may move to different companies within the industry or may know people at other companies who may not wish to hire someone who sued her employer.

10. I was aware that, as a class representative and private attorney general, I might be responsible for some or all of Defendants' legal costs if the lawsuit was not successful and that, even if we won at trial, the case could be delayed further by appeals.

11. I understood the risks generally involved in class and representative action lawsuits, including that the lawsuit could continue for several years and require my effort and attention throughout.

12. Even knowing these risks, and even though I was still nervous about losing the case and having a judgment filed against me for costs or losing job opportunities in the future, I chose to continue and pursue claims.

13. I have kept the best interests of other Class Members in mind while performing my duties as the named plaintiff in this case and committed to prosecuting this case vigorously on behalf of the Class, including myself. I believe that I have demonstrated my ability to advocate for Class-wide interests by initiating this lawsuit and spending a substantial amount of time and effort on the litigation. I have, among other things, searched for and provided work-related documents to my attorneys, described to my attorneys my work experience with Defendants, kept in contact with my attorneys regarding the status of the case, worked with my attorneys to prepare for mediation, was available during the mediation in case questions or concerns arose, and participated in settlement discussions. After mediation, I reviewed the settlement papers and communicated with my attorneys regarding case progress and updates.

14. I estimate that since I retained Wilshire Law Firm in March 2023, I have spent approximately 50 hours on the lawsuit, and I estimate that I will spend an additional 1-3 hours

Docusign Envelope ID: 128B44E4-ACEF-8A89-824B-F75640013D7E

assisting my attorneys through the approval process and disbursement of the settlement checks.

15. Aside from the service award requested on my behalf, I will receive the same personal benefits as all other Class Members. Unlike other Class Members, who are only releasing the wage and hour claims asserted in the lawsuit, I signed a general release of claims as to Defendants, both known and unknown.

16. I will continue to participate actively in this lawsuit as necessary and will continue to make myself available as needed to assist in this case moving forward.

17. I am not aware of any actual or potential conflicts of interest with other Class Members or the proposed Administrator, Apex Class Action LLC.

18. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by this Settlement.

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

Executed on 10/20/2026, at San Diego, California.

DocuSigned by:
Andrea Urias
95BFA3703411483...

Andrea Urias