

**BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

Jeffrey S. Herman (State Bar #280058)

Sergio Julian Puche (State Bar #289437)

Trevor G. Moran (State Bar #330394)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858)551-1223

Facsimile: (858) 551-1232

Website: [www.bamlawca.com](http://www.bamlawca.com)

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SAN DIEGO**

ROGESTER HARRISON and GABRIELLE  
B. YARBROUGH, individuals, on behalf of  
themselves and on behalf of all persons  
similarly situated,

Plaintiff,

v.

SNAPMEDTECH, INC., a Corporation; and  
DOES 1 through 50, inclusive,

Defendants.

**Case No. 37-2023-00053835-CU-OE-CTL**

**DECLARATION OF ROGESTER  
HARRISON IN SUPPORT OF  
MOTION TO APPROVE PAGA  
SETTLEMENT**

Hearing Date: June 12, 2026

Hearing Time: 2:30 p.m.

Judge: Hon. Michael D. Washington  
Dept.: C-73

Action Filed: December 11, 2023

1 I, Rogester Harrison, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration,  
3 and I am making this declaration on behalf of myself, as a named plaintiff, and in support of the  
4 Motion to Approve Private Attorneys General Act Settlement.

5 2. I worked in California as a non-exempt employee of Defendant Snapmedtech, Inc.  
6 (“Defendant”) from November of 2021 to June of 2022.

7 3. I retained my attorneys who are experienced in PAGA representative action  
8 litigation and claims against employers for violations of the California Labor Code. I have no  
9 personal relationship or family ties to my attorneys or any officer of the Court. I am not aware of  
10 having any actual or potential conflicts of interest with another PAGA Member in this case nor am  
11 I aware of having any actual or potential conflicts of interest with the settlement administrator in  
12 this matter.

13 4. I was subject to Defendant’s policies and practices that have been alleged as  
14 unlawful in the Complaint and the PAGA notice sent to the Labor and Workforce Development  
15 Agency. For example, I was forced to work off the clock as my time was recorded on paper and  
16 Defendant instituted a rounding policy by which all hours worked and recorded were rounded to  
17 the nearest quarter of an hour. Further, Defendant’s strict attendance and punctuality policies caused  
18 pre and post shift time under the control of Defendant, as I was expected to be on site and ready to  
19 work prior to my designated shift time. Additionally, I did not always receive compliant meal and  
20 rest breaks, which were often late, short, interrupted, or missed entirely – and when these violations  
21 occurred, I did not receive all break penalty payments I was entitled to. Further, I was not  
22 reimbursed for the cost of my personal cell phone, which was used to carry out job duties for  
23 Defendant.

24 5. In bringing this case for myself, the State of California, and the other employees, I  
25 understood a lot of work would be required and I was willing to, and did, do the work to keep the  
26 case moving forward. For instance, before the complaint was filed I spoke to my attorneys several  
27 times and discussed how Defendant implemented its company policies and procedures. I also  
28 assisted my attorneys in their investigation into my claims by providing them documents and

1 answering their questions. I reviewed the complaint before it was filed and after it was filed, I was  
2 given access to an electronic file sharing program that alerted me via email when important  
3 documents were filed so that I could review them and keep up with the developments in the case.

4 6. My attorneys explained to me the risks and benefits of bringing a representative  
5 action. I understood that I took on the risk, both professionally and financially, in pursuing the case  
6 as a representative PAGA action.

7 7. A mediation took place on June 11, 2025 with Debra Mellinkoff, a well-respected  
8 and experienced wage and hour mediator. The mediation resulted in an agreement to settle the  
9 action. I communicated with my attorneys regarding the terms of the settlement which was reached  
10 between the parties and understood that the recovery in this case was for the benefit of my fellow  
11 coworkers, not just for me, and therefore wanted the best possible result to be obtained for the  
12 PAGA Members. I reviewed and signed the PAGA Settlement on March 3, 2026.

13 8. I have been actively involved with this lawsuit. Although I did not keep time  
14 records, I was in regular contact with my attorneys, reviewed court filings, and spent a significant  
15 amount of time on the issues presented during the lawsuit and in the settlement process. I estimate  
16 that I spent approximately 30-40 hours working on this case up until this point.

17 9. I reviewed the final PAGA Settlement Agreement, and I believe it is fair and  
18 reasonable given the facts of the case.

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

21 Executed on 04/23/2026, at FresnoTexas.  
22 (date) (city, state)

23 Rogester Harrison-Vancy  
24 Rogester Harrison-Vancy (Apr 23, 2026 15:08:27 CDT)

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