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Attorneys for Plaintiff Petra Ruiz, individually, and on behalf of all
others similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

ROGESTER HARRISON and
GABRIELLE B. YARBROUGH,
individuals, on behalf of themselves and on
State of California, as a private attorney
general,

Plaintiffs,

v.

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

Defendants.

Case No. 37-2023-0005835-CU-OE-CTL

*Assigned for All Purposes to:
Judge Michael D. Washington;
Dept. C-73*

**DECLARATION OF GABRIELLE B.
YARBROUGH IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: June 12, 2026

Time: 9:00 A.M.

Dept: C-73

1 I, Gabrielle B. Yarbrough, declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify,
3 I could and would do so competently under oath.

4 2. I make this declaration in support of my Motion for Approval of Private Attorneys
5 General Act Representative Action Settlement.

6 3. I worked for SnapMedTech, Inc.. (“Defendant”) as a non-exempt employee from
7 August 2021 to April 30, 2023 in the position of Registered Nurse.

8 4. Through my attorneys, I filed the action of *Yarbrough v. Snapmedtech, Inc., et al.*
9 (San Diego County Superior Court, Case No. 37-2024-00019678-CU-OE-CTL), on April 26,
10 2024, on behalf of myself and all other non-exempt employees of Defendant.

11 5. When I decided to become involved in and initiate this lawsuit as a Class
12 Representative for hourly/non-exempt employees of Defendant, I understood that I was not only
13 seeking compensation for myself, but also for all other class members who worked for Defendant,
14 and that by doing so, I would be delaying more immediate recovery available to me through the
15 Labor Commissioner’s office, even though I could have received an equal or larger payment for
16 pursuing their wage claims on an individual basis.

17 6. I was also made aware that being a representative in a class action filed on behalf
18 of others would subject me to a stigma that is sometimes associated with those who bring these
19 kinds of lawsuits. I was aware that, as a representative Plaintiff, I might be responsible for some
20 or all of Defendant’s legal costs if the case was not successfully concluded. Even with knowledge
21 of these risks, I was willing to go forward and to act on behalf of the class, but I was nervous
22 about losing and having a judgment filed against me for costs, or losing job opportunities in the
23 future.

24 7. I understood that there were risks involved in class action and representative
25 lawsuits. I understood that the lawsuit could continue for several years and require my services
26 and attention the entire length of the lawsuit. I learned that even if we won at trial, the case could
27 be further delayed by appeals.
28

1 8. With respect to the work I performed on the case, I participated in many
2 conversations with my attorneys, gathered and reviewed documents, and provided information
3 related to my working conditions and Defendant's company structure and operations.
4 Throughout the course of this case, I contacted my attorneys regularly for updates on the status
5 of the case.

6 9. After learning of the arbitration agreement, I understood the best thing for the other
7 employees and the State of California was to keep pursuing the representative PAGA claims.
8 With the guidance of my counsel, I therefore decided to dismiss the Class Action claims which
9 had been filed and to continue to pursue the representative PAGA claims at issue, still facing the
10 same or similar risks I faced with a class action case, since I would remain the face of the PAGA
11 representative case.

12 10. Even with knowledge of these risks, I was willing to go forward and to act on
13 behalf of the State and aggrieved employees, but I was nervous about losing and having a
14 judgment filed against me for costs, or losing job opportunities in the future.

15 11. Prior to trial on the representative PAGA claims, the Parties agreed to attend
16 mediation along with the earlier filed case of *Harrison v. Snapmedtech, Inc., et al.* (San Diego
17 County Superior Court, Case No. 37-2023-0005835-CU-OE-CTL), to see if these matters could
18 be resolved informally on a representative basis. As I and my counsel believed this was in the
19 best interest of the other aggrieved employees, it was determined that attending mediation on a
20 global basis prior to trial was the best course of action.

21 12. For mediation, I assisted my attorneys in preparation and strategy. I spent several
22 hours speaking with my attorneys about the status of the case, its strengths and weaknesses and
23 believed that I assisted them in evaluating the claims and the potential damages for use at that
24 mediation. In preparation for mediation, I also provided information to my counsel concerning
25 my working conditions, and the issues I experienced, including information concerning the use
26 of my private cell phone for Defendant's business purposes, requirements to correspond with my
27 supervisors via calls and texts after work hours and on my days off, and the circumstances around
28 how my hours were recorded in Defendant's timekeeping system and how the hours on my

1 paystubs . As I am informed, this information and the additional documentary support I provided
2 to my counsel in support of these allegations proved influential during the Parties' mediation
3 discussions.

4 13. While I could not attend the mediation in-person, I made myself available to my
5 counsel throughout the day on the date of mediation (for a mediation which lasted over 8 hours),
6 and responded to my counsel's questions in real-time.

7 14. After mediation, I reviewed both the short-form memorandum of understanding
8 ("MOU") and the more detailed long-form settlement agreement now presented to the Court for
9 approval, and discussed the terms with my attorneys to make sure the settlement was fair.

10 15. Based on my review of the settlement terms, conversations with my attorneys, and
11 my understanding of Defendant's operations, I believe the settlement in the case is fair and
12 adequate and in the best interest of the employees covered by the settlement and the State of
13 California.

14 16. Overall, I dedicated approximately 90 hours to pursue the claims in this lawsuit.

15 17. When I initially filed this action, I chose to do so instead of pursuing my own
16 claims in an individual case or a Labor Commissioner claim. As noted above, I understood that I
17 might be responsible for some or all of Defendant's legal costs if the case was not successfully
18 concluded.

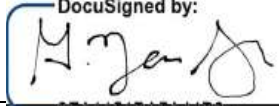
19 18. I also understood that in pursuing this action as a named representative on behalf of
20 others could subject me to a stigma that is sometimes associated with those who bring these kinds
21 of lawsuits - especially within the nursing industry which is a relatively small community.
22 Additionally, the notice of settlement in this case will be sent to approximately 392 current and
23 former employees of Defendant. The notice informs all of these employees that I filed a
24 representative PAGA action lawsuit against the company. Exposing myself to this kind of
25 publicity creates a risk for my future career prospects, since current and former employees of
26 Defendant may move to different companies within the industry or may know people at other
27 companies within the industry who do not want to hire someone who sued her employer.
28

19. I believe that I have done everything my attorneys have asked of me, and I have tried to represent the aggrieved employees to the best of my ability. I think my efforts helped to get the result obtained in this case.

20. I understand that I may be entitled to an additional payment for my role as a representative for the aggrieved employees and my work related to the case. I further understand that this additional payment is not guaranteed and is subject to Court approval. Taking into consideration the time I dedicated to this case and the results achieved through the settlement, I believe that the requested award is reasonable. My opinion about the fairness and adequacy of the settlement in the case is not based on this potential payment.

21. I am not aware of any interests I have that are adverse to the interests of the proposed aggrieved employee group, and I do not have any conflicts that would keep me from adequately representing the aggrieved employees. I remain committed to prosecuting this case vigorously on behalf of the aggrieved employees.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on May 18, 2026, in Warrior, Alabama.

DocuSigned by:

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Gabrielle B. Yarbrough