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Adam Badis and Angelica Reyes

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF RIVERSIDE**

12 ADAM BADIS, ANGELICA REYES, and
13 MONICA MELISSA GUTIERREZ,
individually, and on behalf of other members
of the general public similarly situated;

14 Plaintiffs,

15 vs.

16 COPAN DIAGNOSTICS INC., a New York
17 corporation; and DOES 1 through 100,
inclusive,

18 Defendants.
19
20

Case No.: CVRI2203991

[Assigned for all purposes to the Hon. Harold
W. Hopp, Dept. 1]

**DECLARATION OF ANGELICA REYES
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

Date: December 5, 2024

Time: 8:30 a.m.

Dept: 1

DECLARATION OF ANGELICA REYES

I, Angelica Reyes, hereby declare as follows:

1. I am one of the named plaintiffs in the above-captioned action, Badis v. Copan Diagnostics Inc. I make this declaration on the basis of personal knowledge, except as to those matters stated on information and belief. If called as a witness, I could and would readily and competently testify to all matters stated in this Declaration. I make this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

2. I worked for Defendant Copan Diagnostics, Inc. (“Defendant”) from November 2020 through July 2022 in production.

3. During the time this case has been pending, I had numerous conversations with my attorneys, which included detailed explanations about my working conditions, my work history, my job duties and responsibilities, the identification of other potential witnesses, searching my records for helpful documents and text messages, as well as a review of company records. I also worked with my attorney to assist in the preparation of a mediation brief and I participated in the mediation.

4. I understood the risks I would be taking by pursuing this class action as a plaintiff and class representative, including the potential impact on future employment and risks if Defendant prevailed. I understood that as a class representative, I had a duty to represent the class members' best interests in this matter, and that in order to do so, I would be required to take a substantial amount of time to participate in this lawsuit and to prepare this case.

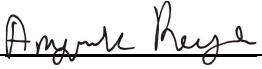
5. In fact, I actively participated in the prosecution of this case. As mentioned above, I conferred with my attorneys to provide documents, information, and potential witnesses. I helped prepare for mediation and continued to provide additional information and documents in the weeks leading up to mediation.

6. As part of this settlement, I am releasing my individual wage and hour claims against Defendant and executing a general release of my rights. Because of the scope of the release, as well as my active participation in this case, I believe that I should receive an enhancement award. I also believe that without my efforts and participation, this lawsuit would

1 not have been brought on behalf of the non-exempt employees of Defendant.

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

4 Executed on November 2_, at 4pm _____, California.

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6  _____

7 Angelica Reyes
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