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(formerly known as MEIKA ELLISON),
individually, and on behalf of other similarly
situated employees*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

MEIKA ELLISON, individually, and on
behalf of other similarly situated employees,

Plaintiff,

vs.

GEOZONING, INC. dba HEALTHSHERPA;
and DOES 1 through 25, inclusive,

Defendants.

Case No.: CGC-25-625111

Honorable Jeffrey S. Ross
Department 613

**DECLARATION OF PLAINTIFF
MEIKA GAINES IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: October 9, 2026
Time: 10:30 a.m.
Dept: 613

Complaint Filed: May 6, 2025
FAC Filed: June 30, 2025
SAC Filed: July 17, 2026
Trial Date: Not Set

DECLARATION OF MEIKA GAINES

I, Meika Gaines (formerly known as Meika Ellison), declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of Oklahoma. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Geozoning, Inc. dba HealthSherpa (“Defendant”) as an hourly-paid, non-exempt Agent Support Representative from approximately August 2021 to approximately December 2021.

3. Because I thought the practices at Defendant may not be lawful, I decided to seek legal advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with Defendant, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Defendant.

5. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained. I made myself available to answer any questions my attorneys had about Defendant's practices and treatment of its employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could. I also assisted my attorneys in their efforts to prepare for mediation.

1 Additionally, I made myself available on the day of mediation to assist with any questions or issues
2 that may have arisen.

3 6. I believe my claims are typical of the Class because Defendant engaged in a pattern
4 and practice of wage abuse against its hourly-paid and/or non-exempt employees, such as requiring
5 myself and the other Class Members to work off-the-clock without compensation, failing to properly
6 pay overtime wages and minimum wages for all hours worked, failing to pay all regular rate wages,
7 failing to pay sick or vacation pay, failing to provide all meal and rest breaks to which we were entitled
8 and failing to pay meal and rest break premiums when due, failing to timely pay wages during
9 employment and upon termination of employment, failing to provide accurate wage statements, failing
10 to reimburse necessary business-related expenses, and requiring unlawful non-compete/non-
11 solicitation agreements.

12 7. I understood that in the event this matter did not settle and proceeded with trial, I would
13 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
14 responsibilities that are necessary for this lawsuit.

15 8. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
16 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
17 also understood there was a risk of losing any job and/or income due to the time that I would have to
18 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. Most
19 importantly, I believe that by pursuing this case, I have taken a significant risk because future
20 employers can easily find out that I sued by prior employer, and that may negatively impact my ability
21 to find employment within this industry, and even outside of it, in the future. In contrast, the other
22 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
23 that I took in bringing this action. In fact, I was aware that it is possible, and relatively easy, to perform
24 background checks of publicly filed documents on the internet, sometimes with nothing more than a
25 simple Google search. Attached hereto as **Exhibit 1** is a true and correct copy of the results of a search
26 for “Meika Gaines v. Geozoning, Inc. dba HealthSherpa” entered on Google.com, accessed on July
27 28, 2026.

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9. I reviewed the settlement agreement, discussed the settlement agreement with my attorneys, and asked them questions before signing it.

10. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California. I have spent approximately 47-52 hours participating in this case as described above. I believe my efforts helped get the result obtained in this case.

11. I understand that any resolution of this lawsuit on a class wide basis is subject to court approval, and any settlement must be designed in the best interest of the Class as a whole. At all times throughout the course of this litigation, I have considered the interests of the Class and put them before my own personal interests. I believe I have adequately represented the Class and will continue to do so throughout the course of this litigation.

12. I understand that incentive or enhancement awards are discretionary and intended to compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA action, and an acknowledgment of the benefits resulting from the representative's actions. I believe my work in this matter is meritorious on these points for the reasons set forth above.

13. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of \$7,500.00 for my efforts and active participation in the case and for the broader, general release of all claims that I have or may have against Defendant in connection with the settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

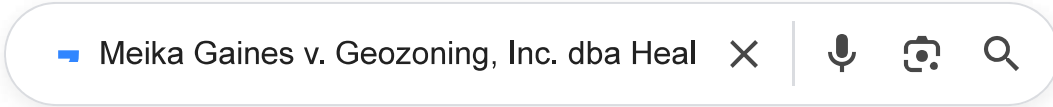
14. I am not related to anyone associated with Blackstone Law, APC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 07/28/2026, at Edmond, Oklahoma.

Meika Ellison Gaines

Meika Gaines

EXHIBIT 1

Meika Gaines v. Geozoning, Inc. dba Heal X

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Meika Ellison Gaines Vs. Geozoning, Inc. Db a ...

The legal document involves a **class action lawsuit filed against GEOZONING, INC. dba HEALTHSHERPA** and others for multiple violations of California labor laws.



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Party Notice: MEIKA ELLISON GAINES VS. GEOZONING ...

On May 06, 2025 a Party Notice was filed involving a dispute between **Gaines, Meika** Ellison, and Does 1 Through 25, Inclusive, **Geozoning, Inc. Db a Healthsherpa**,



New York State Department of Health (.gov)

<https://www.health.ny.gov> › hcra › elector › elect_g1

HCRA Elector List - July 1, 2026

Jul 1, 2026 — A list of organizations that have voluntarily elected to make public goods payments directly to the Department of Healths. **GEOZONING, INC. DBA ...**

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