

1 **BLUMENTHAL NORDREHAUG BHOWMIK**
2 **DE BLOUW LLP**

3 Norman B. Blumenthal (State Bar #068687)
4 Kyle R. Nordrehaug (State Bar #205975)
5 Aparajit Bhowmik (State Bar #248066)
6 2255 Calle Clara
7 La Jolla, CA 92037
8 Telephone: (858)551-1223
9 Facsimile: (858) 551-1232

7 **CENTURION TRIAL ATTORNEYS, APC**

8 Ryan Stygar (State Bar #332764)
9 ryan@centurionta.com
10 8880 Rio San Diego Dr., Suite 800
11 San Diego, CA, 92108
12 Telephone: (888) 225-5792
13 Facsimile: (858) 275-2889

11 Attorneys for Plaintiffs

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF SAN MATEO**

16 AMANDA NUNEZ, an individual, on behalf
17 of herself and on behalf of all persons
18 similarly situated,

18 Plaintiff,

19 vs.

20 UNIVERSITY HEALTHCARE ALLIANCE.,
21 a corporation; and DOES 1 through 50,
22 inclusive,

22 Defendants.

CASE NO.: 23-CIV-05931

ASSIGNED FOR ALL PURPOSES TO:
HON. NANCY L. FINEMAN; DEPT.:4C

**DECLARATION OF RYAN STYGAR IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Hearing Date: June 30, 2026
Time: 2:00 p.m.
Dept: 4C

25 **DECLARATION OF RYAN STYGAR**

27 I, Ryan Stygar, declare as follows:

28
DECLARATION

1 1. I am an attorney at law, duly licensed to practice in the State of California and I am
2 an attorney at Centurion Trial Attorneys, APC. As such, I am familiar with the file in this matter
3 and if called as a witness I could and would competently testify to the following facts of my own
4 personal knowledge.

5 2. This declaration is made in support of Plaintiffs' Motion for Final Approval.

6 3. I graduated from the University of California, Santa Barbara with a B.A. in
7 Philosophy in 2015. Thereafter I attended California Western School of Law, where my research,
8 *Thinking Outside the Box: A Point-Based System of Reintegration for California's Inmate*
9 *Firefighters* was published in Volume 56, Issue 2 (2020) of the California Western Law Review. I
10 graduated *Magna Cum Laude* in 2020. I became a member of the California State Bar in January
11 2021. In that same month, I began representing plaintiffs in the area of employment law, wage and
12 hour, class action, and Private Attorney General Act claims.

13 4. Prior to starting my own law firm, I was a law clerk for the Honorable Judge
14 Kenneth Medel at the California Superior Court, Central Division of the County of San Diego,
15 externed at the U.S. Attorney's Office, Civil Fraud Division, and at the San Diego County District
16 Attorney's Office, Superior Court Division. I am admitted to practice in all state courts in
17 California, the United States District Courts of California - Central District and Southern District.
18 I am also an active member of the Consumer Attorneys of California, ("CAOC") the National
19 Employment Lawyer's Association ("NELA"), and I sit on the board for the San Diego County
20 Bar Association, New Lawyers Division.

21 5. I am fully familiar with the legal and factual issues in this case, and have specific
22 experience litigating complex wage and hour actions as class actions, including employment cases
23 as set forth below.

24 6. I currently serve and have previously served as co-counsel in several complex
25 litigation cases and as co-counsel in PAGA representative actions, including some of the
26 following, which are set forth below:

27 (1) Superior Court of the State of California, County of Alameda, *Brady Santos v.*
28 *Worldpac Inc.*, Case No.: RG21089090

 (2) Superior Court of the State of California, County of San Diego, *Kelly Bell v.*
Scripps Health Inc., Case No.: 37-2022-00005620-CU-OE-CTL.

- 1 (3) Superior Court of the State of California, County of Los Angeles, *Julia Ramos*
2 *v. The Matian Firm, a California Professional Corporation*, Case No.:
3 23STCV05672
- 4 (4) Superior Court of the State of California, County of Los Angeles, *Nigina Calvo*
5 *v. ATTN: Inc., et al.* Case No.: 23STCV17216
- 6 (5) United States District Court, Southern District of California, *Briana Gallardo v.*
7 *Amazon.com Services, LLC* Case No.: 3:22-cv-00297-LAB-AHG (Active)
- 8 (6) Superior Court of the State of California, County of San Bernardino, *Alex*
9 *Hague v. Hub Trucking Group, Inc.* Case No.: CIVSB2328153 (Active)
- 10 (7) United States District Court, Central District of California, *Robert Sorey et al,*
11 *v. The Ritz-Carlton Hotel Company*, Case No.: 2:22-cv-08636-FMO-PVC
- 12 (8) Superior Court of the State of California, County of Los Angeles, *Daisy*
13 *Gonzalez v. Advent Global Solutions, Inc.* Case No.: 23STCV26886
- 14 (9) Superior Court of the State of California, County of Los Angeles, *Jasmine*
15 *Sutton et al v. Crossroads Equipment Lease and Finance, LLC*, Case No.:
16 23STCV21046.

17 7. The settlement that has been reached, subject to this Court's approval, is the
18 product of substantial effort by the parties and their counsel. The settlement was reached after
19 extensive factual and legal investigation and research, numerous discussions, exchanges of
20 documents and information, and correspondence. The settlement amount is, of course, a
21 compromise figure. It took into consideration the risks related to liability, damages, and all the
22 defenses asserted by Defendant.

23 8. Plaintiffs assert that the wage and hour claims and the claims for resulting penalties
24 would be certified. Plaintiffs' counsel reviewed documents produced by Defendant, including but
25 not limited to time and payroll records, and based thereon reasonably believed that Plaintiffs
26 would have a significant chance of certifying the class.

27 9. On the other hand, Defendant has argued that Plaintiffs cannot meet the
28 requirements of class certification. Defendant further contends that class certification would not be
warranted because individual liability issues predominate Plaintiffs' claims.

10. While Plaintiffs believe in their chance of success, Plaintiffs recognized the
potential risk, expense and complexity posed by further litigation. Litigating Plaintiffs' claims in
this litigation—claims that involve numerous Class Members during the class period—would require

DECLARATION

1 substantial additional preparation and discovery and ultimately would involve the deposition and
2 presentation of numerous witnesses (including expert witnesses), as well as the consideration,
3 preparation, and analysis of expert reports. Therefore, should litigation have progressed any
4 further, there would have been significant expense incurred by each side.

5 11. Again, Plaintiffs and Defendant have very strong positions on liability in this case.
6 Defendant denies any liability or wrongdoing associated with the claims alleged in Plaintiffs'
7 operative complaint.

8 12. In light of the contested legal and factual issues, the risks of continued litigation,
9 and substantial benefits to Class Members under the settlement, the terms and conditions of this
10 class settlement are fair and reasonable to all sides.

11 13. For the foregoing reasons, I request the court grant final approval of the settlement
12 in this case.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct this 28th Day of May, 2026, in San Diego, California.

15 By,

16 Dated: May 28, 2026

17 /s/ Ryan Stygar

18 RYAN STYGAR, ESQ.

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DECLARATION