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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

JULLY MULLINGS, individually and on
behalf of others similarly situated individuals
and members of the general public,

Plaintiff,

vs.

ANTELOPE AMBULANCE SERVICE, a
California Corporation; and DOES 1 through
25, inclusive,

Defendants.

Case No. 23STCV30241

Honorable Carolyn B. Kuhl
Department SS12

**DECLARATION OF PLAINTIFF JULLY
MULLINGS IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, ATTORNEYS' FEES
AND COSTS, ENHANCEMENT PAYMENT,
AND SETTLEMENT ADMINISTRATION
COSTS**

Date: December 18, 2025
Time: 10:30 a.m.
Dept.: SS12

Complaint Filed: December 11, 2023
FAC Filed: January 18, 2024
Trial Date: Not Set

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1 much information as I could.

2 6. I understood that in the event this matter did not settle and proceeded to trial, I would
3 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
4 other responsibilities necessary for this lawsuit.

5 7. I took a considerable risk by bringing and pursuing this lawsuit for several reasons.
6 First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also
7 understood there was a risk of losing any current job and/or income due to the time that I would have
8 to spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed.
9 Most importantly, I believe that by pursuing this case, I have taken a significant risk because future
10 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
11 to find employment within this industry – and even outside of it – in the future. In contrast, the other
12 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
13 that I took in bringing this action.

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

16 9. I believe that I have done everything that my attorneys have asked of me and tried, to
17 the best of my ability, to seek relief for the Class, the Aggrieved Employees, and the State of
18 California. In total, I have spent approximately 30 to 35 hours participating in this case as described
19 above. I believe my efforts helped get the result obtained in this case.

20 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
21 approval, and any settlement must be in the best interest of the Class as a whole. At all times throughout
22 the course of this litigation I have considered the interests of the Class and put them before my own
23 personal interests.

24 11. I understand that incentive or enhancement awards are discretionary and intended to
25 compensate named plaintiffs for the quality and quantity of the work done on behalf of the class and
26 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
27 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
28 my work in this matter warrants a modest incentive award for the reasons set forth above.

12. I respectfully request that the Court approve 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 and favorable terms of the settlement, I believe that this amount is reasonable.

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

Executed on 04/14/2025, at Rosamond, California.

Jully Mullings

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