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7 Attorneys for Defendant Premier Medical Transport, Inc.

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF RIVERSIDE
10

11 ISABELLE FLORES, individually, on a
12 representative basis, and on behalf of all
13 others similarly situated;

14 Plaintiff,

15 vs.

16 PREMIER MEDICAL TRANSPORT,
17 INC., a California Corporation; and DOES
18 1 through 20, inclusive;

19 Defendants.
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Case No.: CVRI2402632

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

**DECLARATION OF JACK JIMENEZ IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing

Date: March 4, 2025

Time: 8:30 a.m.

Dept.: 1

1 I, Jack E. Jimenez, state and declare:

2 1. I am an attorney duly licensed to practice law in the State of California and I am
3 attorney of record for Defendant in this action. I am fully familiar with the facts of this case and
4 submit this declaration in support of Plaintiff's Motion for Preliminary Approval. The matters set
5 forth herein are based upon my personal knowledge and, if called upon as a witness, I could and
6 would give competent testimony with respect to the matters contained herein.

7 2. I am the handling attorney on this matter since our law firm was retained in the
8 defense of this matter. I am unaware of any class, representative or other collective action in any
9 court in this or any other jurisdiction that asserts claims similar to those asserted in this action on
10 behalf of a class or group of individuals some or all of whom would also be members of the class
11 defined in this action. I have also made a reasonable inquiry with other attorneys at my firm, and
12 none of the other attorneys are aware of any such related case or cases.

13 3. The typical class members in this action are adults (over eighteen years of age)
14 with at least a high school education, and speak, understand, and write English without difficulty.

15 4. I have reviewed the Class Notice, Request for Exclusion Form, Objection Form,
16 and Dispute Form. The documents are drafted in plain English, and I believe that the class
17 members would not have difficulty understanding the material.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct. Executed on February 18, 2025, at Los Angeles, California.

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21 By:

22 Jack E. Jimenez
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