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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF KERN

YATZIRY MENDOZA, an individual and on behalf of all others similarly situated;

Plaintiff,

vs.

INTEGRATED PRACTICE MANAGEMENT, LLC, a California limited liability company; and DOES 1 through 50,

Defendants.

Case No.: BCV-24-102804
[Related to Case No. BCV-24-104472]

[Assigned for All Purposes to:
Hon. T. Mark Smith, Dept. T-2]

DECLARATION OF YATZIRY MENDOZA IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

(Filed concurrently with Motion for Preliminary Approval; Supporting Declarations; and [Proposed] Order)

DATE: November 17, 2026
TIME: 8:30 a.m.
DEPT: T-2

Action Filed: August 20, 2024
Trial Date: Not Set

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I, Yatziry Mendoza, hereby declare as follows:

1. I am an individual over the age of 18 year and the named Plaintiff in the above-captioned matter. This declaration is submitted in support of approval of the proposed class action settlement ("Settlement") reached in this case. I have personal knowledge of the facts contained in this declaration, and if called as a witness, could and would testify as to their accuracy.

2. I was employed by Defendant Integrated Practice Management ("Defendant") as an hourly-paid, non-exempt employee from approximately September 5, 2023 to approximately June 19, 2024 in Bakersfield, California, first as receptionist and later as an ER Navigator in Bakersfield, California. During my employment with Defendant, I was subject to Defendant's wage and hour policies and practices that are at issue in this case.

3. Specifically, I was not paid all wages due including minimum and overtime wages due to sometimes working off the clock, I did not receive all of my meal and rest breaks including second meal breaks and third rest breaks when I worked over 10 hours, and I was not reimbursed all necessary business expenses. As a result of the foregoing issues, I believe I received inaccurate wage statements and was not paid all wages when my employment with Defendant ended. I believe other non-exempt employees of Defendant were subject to the same policies and procedures discussed above and that my claims against Defendant for unpaid wages and statutory and civil penalties are typical of Class Members' claims.

4. I have been actively involved in this case since I first retained Justice for Workers, P.C. ("JFW") in August 2024. Without waiving the attorney-client privilege, prior to filing this lawsuit, my attorneys explained my role and responsibilities as a Class Representative, and I understand my responsibilities as a Class Representative. Since retaining my attorneys, I have had many discussions and meetings with the attorneys and staff at JFW, discussions regarding Defendant's wage and hour practices and my claims in this case, litigation strategy, updates on how the case was proceeding, the Settlement, and how I could help the case and potential Class Members. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant documents with my attorneys. I also understand that as part of the Settlement, I have agreed to a general release of claims against Defendant, which is broader than the release of claims agreed to by

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other Class Members. I estimate that I have spent at least 20 hours on this case from the time I first spoke with my attorneys regarding this case until the present.

5. Furthermore, there is no conflict between my interests and the interests of the class that I am seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that I was injured by the same company-wide policies and practices to which the proposed Class was subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the proposed settlement to assure that it is fair.

6. I understood that at the time I filed this action, as a Class Representative, I owed a duty to the putative class members to faithfully prosecute this action with their best interests at the forefront of every decision. I understood that I could not make any decision in this action for the sole benefit of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice my personal best interests for the benefit of the interests of the putative class members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour practices. I believe that I faithfully executed the duties of a Class Representative throughout this litigation and will continue to do until this litigation is fully and finally resolved.

7. I understand that my attorneys will request that the Court approve a service award of $10,000.00 for my efforts on behalf of the Class. I believe this amount is reasonable based on the amount of time and effort I have devoted to this case, the risks I have undertaken as a Class Representative. My support for the Settlement is not contingent on my receiving this service award.

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

Executed on September 4, 2026 at Bakersfield, California.



Yatziry Mendoza

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