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SUPERIOR COURT OF CALIFORNIA

FOR THE COUNTY OF KERN

* * *

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

Plaintiff,

v.

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

Defendants.

Case No. BCV-24-102804
Dept. T2
[Hon. T. Mark Smith]

DECLARATION OF NAKEI KEMP IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

Complaint Filed: August 20, 2024
Trial Date: TBD

I, Nakei Kemp, declare as follows:

1. The facts set forth herein are personally known to me and, unless otherwise noted, are based on my firsthand knowledge and/or observation. If called as a witness, I could and would competently testify thereto under oath.

2. I am the Human Resources Manager for Defendant Integrated Practice Management, LLC ("Defendant"), and have been during the entirety of the instant case. I generally apprised of any employment law related matters pending against Defendant at any given time, including the lawsuit filed by the Plaintiff in this matter.

3. I am unaware of any actual or potential conflicts of interest between Defendant and Phoenix Settlement Administrators, which the Parties have agreed should be appointed as the Settlement Administrator in this case, subject to court approval.

4. I am unaware of any other pending class or representative matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

5. I declare under penalty of perjury under the laws of California that the foregoing is true and correct, and that this declaration was executed in Bakersfield, California on October 9, 2026.

By _____
NAKEI KEMP