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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

JOSEPH NAUMANN, an individual, on behalf
of himself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

CENTRAL ADMIXTURE PHARMACY
SERVICES, INC., a Delaware corporation; B.
BRAUN MEDICAL INC., a Pennsylvania
corporation; AESCULAP, INC., a California
corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. CGC-24-612758

**DECLARATION OF JOSEPH NAUMANN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: March 16, 2026

Time: 9:00 a.m.

Dept.: 302

1 I, JOSEPH NAUMANN, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am one of the two named Plaintiffs
4 in the above wage and hour class action filed against CENTRAL ADMIXTURE PHARMACY
5 SERVICES, INC. (hereinafter "Defendant").

6 2. This declaration is being submitted in support of Plaintiffs' Motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. I believe that I am, have been, and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
10 to represent.

11 4. I was employed by Defendant from March of 2023 to July of 2023, as a non-exempt
12 employee. During my employment, I was denied legally compliant meal and rest periods. Throughout
13 my employment, I was subject to Defendant's written policies and procedures contained in, among
14 other documents, Defendant's Employee Handbook.

15 5. Generally, my lawsuit claims that Defendant failed to provide compliant meal and rest
16 periods, failed to reimburse for mandatory business expenses, failed to properly calculate the regular
17 rate of pay, failed to furnish accurate itemized wage statements, and failed to pay all wages upon
18 separation.

19 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
20 to represent because I was subject to the same alleged unlawful employment policies and practices at
21 issue in this action, including but not limited to, Defendant's failure to provide compliant meal and
22 rest periods, failure to reimburse for mandatory business expenses, failure to properly calculate the
23 regular rate of pay, failure to furnish accurate itemized wage statements, and failure to pay all wages
24 when due. Factually, Defendant's policies and practices apply class wide, and Defendant's liability
25 can be determined by facts common to all members of the Class.

26 7. Further, there is no conflict between my interests and the interests of the class that I am
27 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
28 I was injured by the same company-wide policies and practices to which the proposed Class was

1 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
2 of the Class by initiating this litigation and evaluating the proposed settlement to assure that it is fair.

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

12 9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
13 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
14 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

15 10. On April 28, 2025, I submitted a complaint to the Civil Rights Department of the State
16 of California alleging that Defendant violated the FEHA. On the same day, the Civil Rights
17 Department issued me a Right to Sue letter allowing Plaintiff to proceed with a lawsuit against
18 Defendant. (CRD Matter Number: 202504-29160928). Separate from the Class Action and PAGA
19 Settlement, I entered into an individual settlement with Defendant in which I granted Defendant a
20 broad release of all claims, including the claims outlined in my CRD complaint. I will file this
21 settlement agreement under seal for the Court to review in camera, at the Court's request.
22

23 I declare under the penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct. Executed 01/15/2026, at Moundridge, Kansas.

25
26 By: 
27 Joseph Paul Naumann (Jan 15, 2026 16:23:12 CST)
28 JOSEPH NAUMANN