

**BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

Jeffrey S. Herman (State Bar #280058)

Sergio Julian Puche (State Bar #289437)

Trevor G. Moran (State Bar #330394)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858)551-1223

Facsimile: (858) 551-1232

Website: [www.bamlawca.com](http://www.bamlawca.com)

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

SHERRY RUMPH, as an individual, on behalf  
of herself and those similarly situated and on  
behalf of the State of California, as a private  
attorney general,

Plaintiffs,

vs.

SEDGWICK CLAIMS MANAGEMENT  
SERVICES, INC., a Corporation; and DOES 1  
through 50, inclusive,

Defendants.

**Case No. 24LBCV01324**

**DECLARATION OF SHERRY RUMPH  
MORALES IN SUPPORT OF MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS SETTLEMENT**

Hearing Date:

Hearing Time:

Judge: Hon. Nicole M. Heeseman

Dept: S25

Date Filed: June 26, 2024

Trial Date: Not set

1 I, Sherry Rumph, declare as follows:

2 1. I am over the age of eighteen, a Plaintiff and a proposed Class Representative in the above-  
3 entitled matter. I submit this declaration in support of the Motion for Preliminary Approval of Class  
4 Settlement and in support of my application for a class representative service payment.

5 2. I have personal knowledge of all the facts stated herein. I could and would competently  
6 testify under oath to these facts in court if requested to do so.

7 3. I worked for the defendant Sedgwick Claims Management Services, Inc. ("Sedgwick") in  
8 California from October of 2022 to June of 2023, and during that time period was misclassified by  
9 Sedgwick as a salaried employee who was exempt from overtime pay and the legally required meal  
10 and rest breaks.

11 4. I retained my attorneys who are experienced in both class action and PAGA representative  
12 action litigation and claims against employers for violations of the California Labor Code. I have  
13 no personal relationship or family ties to my attorneys or any officer of the Court. I am not aware  
14 of having any actual or potential conflicts of interest with another class member in this case. I am  
15 not aware of any other pending matter or action asserting claims that will be extinguished or  
16 adversely affected by this settlement.

17 5. I decided to file this class action lawsuit and be a plaintiff/class representative because I felt  
18 that my legal rights as an employee and others like me were violated. I was misclassified as a  
19 salaried employee who was exempt from overtime pay and the legally required meal and rest breaks.  
20 Indeed, as a result of my misclassification, I was not paid overtime wages, despite working over 40  
21 hours in any given week. I was also not provided proper meal and rest periods due to  
22 misclassification. Defendant also therefore failed to pay my "paid time off" at my regular rate

23 6. I spoke to my attorneys several times and discussed how Sedgwick implemented its  
24 company policies and procedures. I also assisted my attorneys in their investigation into my claims  
25 by providing them documents and answering their questions. I reviewed the complaint before it  
26 was filed and was given access to an electronic file sharing program that alerted me via email when  
27 important documents were filed so that I could review them and keep up with the developments in  
28 the case which I understood was one of my duties as a class representative. I could also access court

1 filings from this case on my attorney's law firm website. Also, I was informed that Sedgwick had  
2 the right to take my deposition, and that the preparation and deposition itself could take multiple  
3 days. Although my deposition was not taken, I feel I would have been adequately prepared and  
4 comfortable to give testimony on my experiences.

5 7. Even though this action is in the process of settling, I was and remain prepared to perform  
6 all the duties of a class representative. I understand that as a class representative I have assumed a  
7 fiduciary responsibility to prosecute this class action on behalf of the absent class members. I have  
8 understood that as a fiduciary, I have a duty to prosecute this action for the benefit of the class  
9 members and surrender any right to compromise the group action for an individual gain.

10 8. I understood that being a plaintiff/class representative in this case meant that I was seeking  
11 damages not only for myself but also other current and/or former misclassified employees working  
12 for Sedgwick in California who make up the class. I felt that these individuals were not aware of  
13 their labor law rights and even if they were they would probably be apprehensive about speaking  
14 up or even simply because of the time, effort and risk involved in filing a class action lawsuit.

15 9. I understood that being a part of this lawsuit involved risks. For example, my attorneys  
16 explained to me that if the case went to trial and we lost, I could be held responsible to pay for all  
17 or part of the attorney fees and costs paid by Sedgwick to defend this lawsuit. Also, I knew there  
18 was a risk that future employers, if they ever find out about this lawsuit, could hold it against me or  
19 downgrade me as a potential hire. As the only named Plaintiff in this case it would not be difficult  
20 for a future employer to become aware that I sued a former employer for labor law violations.  
21 Ultimately, I decided these risks were worth it and decided to fight for my rights and the rights of  
22 others regardless of the risks, time and effort I spent on this case.

23 10. During the lawsuit I stayed in touch with my attorneys by phone and email. I also kept up  
24 to date on important developments by reviewing court filings that were made available to me  
25 electronically as I described above.

26 11. A mediation took place on June 23, 2025, with Steve Serratore, Esq., a well-respected and  
27 experienced mediator of wage and hour class actions. After the mediation the parties were able to  
28 come to an agreement to settle the action. I communicated with my attorneys regarding the terms

1 of the settlement which was reached between the parties and understood that I was representing  
2 absent class members and therefore wanted the best possible result to be obtained for the class  
3 members and I believe a very positive result was in fact achieved via settlement. I reviewed and  
4 signed the Memorandum of Understanding on July 24, 2025. When the final settlement agreement  
5 was ready, I reviewed it closely and signed it.

6 12. I have been actively involved with this lawsuit performing the duties described above.  
7 Although I did not keep time records, I was in regular contact with my attorneys, reviewed court  
8 filings and spent a significant amount of time on the issues presented during the lawsuit and in the  
9 settlement process. I estimate that I spent approximately 30-40 hours working on this case up until  
10 this point. I believe I have been diligent and have done what is expected of a named plaintiff and a  
11 proposed class representative to date, and will continue to do so. I have and always will maintain  
12 the best interest of the class members.

13 13. My attorneys explained to me that the settlement process involves a two-step review by the  
14 Court to determine whether the settlement is fair before approving the settlement. I know this  
15 process also involves notifying all class members of the settlement terms and of their rights to make  
16 a claim for their settlement share, to opt out of the settlement or to object to the settlement.

17 14. I believe I did the right thing by filing this case on behalf of the class members who, subject  
18 to court approval, are in line to receive monetary payments as a result of this case and settlement.  
19 This is money they may never have ever gotten if I did not pursue this action on their behalf. I feel  
20 significant personal satisfaction to know that I played a role in the class members being entitled to  
21 monetary payments as a result of the filing of this lawsuit. I also believe that the requested class  
22 representative service award of \$15,000 from the settlement is fair compensation for the work I  
23 performed and the risks I undertook.

24 15. In light of all the time and effort I have spent on this case, the risk I undertook by suing a  
25 former employer, the exposure to being responsible for paying Sedgwick costs in the event we did  
26 not win the case, the reputational risk that future employers may hold this lawsuit against me, and  
27 in light of the size of the settlement, I believe the request for \$15,000 as a class representative  
28 service payment is fair and reasonable.

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

3 Executed on 10/24/2025, at Moreno Valley, CA.  
4 (city, state)

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6 

Sherry Rumph (Oct 24, 2025 14:42:40 PDT)

Sherry Rumph