

David Mara, Esq. (230498)
Jill Vecchi, Esq. (299333)
MARA LAW FIRM, PC
2650 Camino Del Rio North, Suite 302
San Diego, California 92108
Telephone: (619) 234-2833
Facsimile: (619) 234-4048
Email: dmara@maralawfirm.com
jvecchi@maralawfirm.com

Douglas Han, Esq. (232858)
Shunt Tatavos-Gharajeh, Esq. (272164)
JUSTICE LAW CORPORATION
751 N. Fair Oaks Ave., Suite 101
Pasadena, California 91103
Telephone: (818) 230-7502
Facsimile: (818) 230-7259
Email: dhan@JusticeLawCorp.com
statavos@JusticeLawCorp.com

Attorneys for ROYA NOORI and PAOLA OLIVO, on behalf of themselves,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

ROYA NOORI and PAOLA OLIVO on
behalf of themselves, all others similarly
situated, and on behalf of the general
public,

Plaintiffs,

v.

VISTA COMMUNITY CLINIC; and
DOES 1-100,

Defendants.

Case No.: 37-2023-00000144-CU-OE-CTL
(Consolidated with Case No.
37-2023-00005665-CU-OE-CTL)

*[Assigned for All Purposes to the
Honorable James A. Mangione; Dept. C-75]*

**DECLARATION OF PLAINTIFF ROYA
NOORI IN SUPPORT OF SETTLEMENT
APPROVAL**

Complaint Filed: January 3, 2023
Trial Date: None Set

1 I, ROYA NOORI, hereby declare under penalty of perjury as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could
3 and would competently testify thereto, except as to those matters stated upon information
4 and belief, and as to those matters, I believe them to be true.
- 5 2. I am a named Plaintiff and class representative in the above-captioned lawsuit, and I
6 submit this declaration in support of settlement approval.
- 7 3. I worked for Vista Community Clinic (“Vista”) as a non-exempt, hourly employee from
8 approximately September 8, 2020, to approximately May 3, 2022.
- 9 4. I brought this action to redress certain employment claims that I had against Vista. On
10 January 3, 2023, I brought this lawsuit.
- 11 5. I had many meetings and conversations with my attorneys about my experience working
12 for Vista.
- 13 6. Since becoming a class representative, I diligently worked on this case.
- 14 7. Throughout the case, I regularly talked with my attorneys. I always answered phone calls
15 from my attorneys or called them back promptly when they called. I also promptly
16 responded to emails sent by my attorneys. On many occasions, I spoke with my attorneys
17 for case related purposes.
- 18 8. I have assisted my attorneys in investigating the case. I have worked diligently to help
19 progress the case. I have spent numerous hours on this case.
- 20 9. I was aware that, at some point in this case, I would have my deposition taken. I knew
21 that the deposition could take a full day and that I may have to meet with my attorneys
22 prior to my deposition. I was at all times ready and willing to sit for my deposition.
- 23 10. Although I did not attend the mediation in person, I was available by phone during the
24 mediation. I gave my consent to settle with Vista for the gross settlement amount of
25 \$3,000,000. I completely and carefully reviewed the memorandum of understanding and
26 the settlement agreement. I then signed the memorandum of understanding and settlement
27 agreement.
28

1 11. In light of the work I performed in this case and the duties associated with being a class
2 representative in a case of this magnitude, I believe the \$10,000 service payment award
3 is reasonable. I understand that this additional service award is not guaranteed and is
4 subject to Court approval.

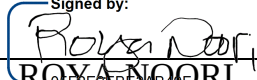
5 12. I have and will continue to adequately represent all of the interests of the class. With my
6 status as class representative, I will treat the interests of the Class above my interests.

7 13. My claims are typical of the Class Members because I am similarly situated to all current
8 and former non-exempt, hourly employees who were employed by Defendant in
9 California at any time from January 3, 2019, through January 18, 2024. Thus, my interests
10 are the same as all members of the proposed Class.

11 14. I recognize that any resolution of this matter must be approved by the Court in terms of
12 whether the settlement is fair and reasonable, and that I am obligated to protect the
13 interests of all of Class Members for the Class Period.

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

16 Dated: 10/9/2024

17 By: 
18 ROYA NOORI
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