NOSRATILAW, APLC 1 Omid Nosrati, Esq. (SBN 216350) 2 Rene Maldonado, Esq. (SBN 289739) 1801 Century Park East, Suite 840 3 Los Angeles, California 90067 4 Telephone: (310) 553-5630 Facsimile: (310) 553-5691 5 Email: omid@nosratilaw.com 6 Attorneys for Plaintiffs, 7 MARJORIE SAINT HÜBERT, VALERIE MARTINEZ, and THERESE SVENGERT, 8 individually and on behalf of all others similarly situated 9 MARJORIE SAINT HUBERT, VALERIE MARTINEZ, and THERESE SVENGERT, Case No.: 2:21-cv-00086-VAP-JEMx 10 individually and on behalf of all others **CLASS ACTION** 11 similarly situated, **DECLARATION OF PLAINTIFF** 12 Plaintiffs, MARJORIE SAINT HUBERT IN 13 SUPPOR OF SECOND RENEWED VS. **MOTION FOR PRELIMINARY** 14 EQUINOX HOLDINGS, INC., a Foreign Corporation; and DOES 1 through 50, APPROVAL OF CLASS ACTION 15 **SETTLEMENT** inclusive, 16 Defendants. 17 18 19 20 21 22 23 24 25 26 27 28

DECLARATION OF PLAINTIFF MARJORIE SAINT HUBERT IN SUPPOR OF SECOND RENEWED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

DECLARATION OF MARJORIE SAINT HUBERT

I, Marjorie Saint Hubert, declare as follows:

- 1. I am over the age of 18 and I am the named Plaintiff in the above-entitled action. All of the facts set forth herein are within my personal knowledge, and as to matters stated on information and belief, I believe them to be true.
- 2. I was an employee of Equinox as a Membership Advisor and Front Desk Associate from on or about December 6, 2017 to September 9, 2019. I worked at various locations throughout my employment.
- 3. From approximately October 2019 to the present, I have spent approximately 30 hours in connection with this case. For example, I have spent time communicating with my legal counsel on numerous occasions, both in person and over the phone. Furthermore, I assisted my counsel in searching for and reviewing documentation regarding the allegations in my complaint. I also assisted my counsel on several occasions prior to the mediation to assist them in reviewing the allegations in my case. I also participated in discovery and deposition.
- 4. On September 9, 2022, I attended the mediation and actively participated to help reach a fair and reasonable settlement for the class. I have reviewed the settlement paperwork and have been involved in the status of this matter since the first motion for preliminary approval up to this current, second renewed motion for preliminary approval.
- 5. I respectfully request that the Court award me \$5,000.00 as an enhancement award in light of the amount of time I spent assisting my counsel in prosecuting this action since 2019.
- 6. My interests in this case do not conflict with the interests of the other class members. I have and will continue to pursue the interests of the class members as part of this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this $\frac{13.00}{}$ day of December 2023 at Los Angeles, California. MARJORIE SAINT HUBERT, Declarant DECLARATION OF PLAINTIFF MARJORIE SAINT HUBERT IN SUPPOR OF SECOND

RENEWED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT