

Exhibit 4

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11 MEDICAL MANAGEMENT
INTERNATIONAL, INC., D/B/A BANFIELD
12 PET HOSPITAL

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF LOS ANGELES**
15

16 JESSICA BELLOWS, Individually and On Behalf
of All Others Similarly Situated,

17 Plaintiff,

18 vs.

19 MEDICAL MANAGEMENT
20 INTERNATIONAL, INC., D/B/A BANFIELD
PET HOSPITAL,

21 Defendant.
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Case No. 25STCV14247

**DECLARATION OF ELIZABETH A.
FALCONE IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Judge: Hon. David S. Cunningham III

Hearing Date: June 2, 2026

Hearing Time: 9:00 a.m.

Dept.: 11

Action Filed: May 14, 2025

Trial Date: Not Set

DECLARATION OF ELIZABETH A. FALCONE

I, Elizabeth A. Falcone hereby declare and state as follows:

1. I am a Shareholder with the law firm Ogletree, Deakins, Nash, Smoak & Stewart, P.C. ("Ogletree"), attorneys for Defendant Medical Management International, Inc. d/b/a Banfield Pet Hospital in this action. I am authorized to practice law before this Court and all the courts of the State of California. I submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement. I have personal knowledge of the facts set forth in this declaration except, where stated on information and belief and, if called as a witness, could and would testify competently to such facts under oath.

2. Ogletree has no financial interest or involvement in the governance or work of Legal Aid Foundation of Los Angeles.

I declare under the penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct. Executed this 17th day of April 2026, in Portland, Oregon.

Elizabeth A. Falcone

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PROOF OF SERVICE

Jessica Bellows v. Medical Management International, Inc.
Case No. 25STCV14247

I am and was at all times herein mentioned over the age of 18 years and not a party to the action in which this service is made. At all times herein mentioned I have been employed in the County of Sacramento in the office of a member of the bar of this court at whose direction the service was made. My business address is 400 Capitol Mall, Suite 2800, Sacramento, CA 95814. My email address is elaine.blizzard@ogletree.com.

On April 17th, 2026, I served the following document:

**DECLARATION OF ELIZABETH A. FALCONE IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

on the following party:

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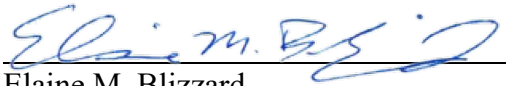
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☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the person(s) at the e-mail addresses listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on April 17th, 2026 at Sacramento, California.


Elaine M. Blizzard