

JAMES HAWKINS APLC

James R. Hawkins (SBN 192925)

James@jameshawkinsaplc.com

Christina M. Lucio (SBN 253677)

Christina@jameshawkinsaplc.com

9880 Research Drive, Suite 200

Irvine, California 92618

Telephone: (949) 387-7200

Facsimile: (949) 387-6676

Attorneys for Plaintiff TANIYA ABRON,
on behalf of herself and all others similarly situated

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

TANIYA ABRON, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

UNIVERSITY HEALTHCARE ALLIANCE,
a California Corporation; and DOES 1-10,
inclusive,

Defendants.

Case No. RG20066438

Assigned for all purposes to
Hon. Evelio Grillo
Dept. 21

**DECLARATION OF JENNIFER
FORST WITH RESPECT TO
SETTLEMENT
ADMINISTRATION AND CLASS
NOTICE**

Date: December 29, 2023

Time: 9:00 a.m.

Dept: 21

Reservation ID: 949352402507

Action Filed: June 30, 2020

SAC Filed: Sept. 28, 2022

Trial Date: None Set

1 I, Jennifer Forst, declare as follows:

2
3 1. I am a Senior Case Manager for CPT Group, Inc. (“CPT”), the Court-approved
4 class action Settlement Administrator for *Taniya Abron v. University Healthcare Alliance*. I
5 have personal knowledge of the facts set forth in this declaration and, if called upon to testify, I
6 could and would testify competently to such facts.

7 2. CPT has extensive experience in providing notice of class actions and
8 administering class action settlements. In the past 30 plus years, we have provided notification
9 and/or settlement administration services in over one thousand class action cases. CPT was
10 selected by both parties to provide notice of the settlement and process exclusions in this action.
11 In this capacity, CPT was charged with administering the settlement terms and conditions
12 detailed herein, included but not limited to:

- 13 a) preparing, printing and mailing the Notice of Class Action Settlement, Exclusion
14 Form and Objection Form (herein referred to as “Notice Packet”);
15 b) processing undeliverable mail and locating updated addresses for Class Members;
16 c) establishing and maintaining a toll-free case hotline where Class Members can speak
17 to case representatives regarding case specific questions;
18 d) receiving inquiries and other communications about the settlement;
19 e) establishing and maintaining a case email address where Class Members can email
20 with case representatives regarding case specific questions;
21 f) establishing a case specific static website with key dates and documents;
22 g) processing Class Members’ inquiries about the Notice Packet, and Disputes,
23 Requests for Exclusion, and Objections;
24 h) providing Class Counsel and Counsel for Defendant a declaration attesting to the
25 completion of the notice process, in addition to weekly updates during the response
26 period;

- i) establishing and administering a qualified settlement fund to disburse all settlement payments;
- j) calculating Individual Settlement Payments for each Participating Class Member;
- k) issuing and distributing Class Counsel's Fees and Costs, the Named Plaintiff's Service Award, the LWDA Payment and Individual Settlement Payments to Participating Class Members;
- l) completing any associated tax withholding and reporting to the State and Federal tax authorities;

3. CPT received the Court-approved text for the Notice Packet from Counsel on August 28, 2023.

4. CPT prepared a draft of the Notice Packet for mailing to the Class Members consisting of a 5-page Notice of Class Action Settlement and Hearing Date for Final Court Approval, 1-page Request for Exclusion Form, and 1-page Objection Form. CPT received approval from the Parties and a sufficient number of Notice Packets were printed according to the anticipated class size. Attached hereto as Exhibit "A" is a true and correct copy of the Notice Packet.

5. On September 8, 2023, CPT received a data file from Defendant containing each Class Member's name, last-known mailing address, Social Security number, Employee ID and hire and termination dates. The mailing list contained one thousand and seven hundred (1,700) Class Members, one thousand and four hundred (1,400) of which were also Aggrieved Employees.

6. On October 2, 2023, CPT conducted a National Change of Address (NCOA) search in an attempt to update the class list of addresses as accurately as possible. A search of this database provides updated addresses for any individual who has moved in the previous four years and notified the U.S. Postal Service of their change of address. As a result of the NCOA, CPT was able to locate three hundred (300) new or updated addresses.

1 7. The Notice Packets were enclosed in envelopes with the names and known
2 addresses printed on them. On October 9, 2023, the Notice Packets were mailed via U.S. First-
3 Class mail to all Class Members. The deadline to submit disputes, requests for exclusion or
4 objections was December 8, 2023

5 8. As of the date of this declaration, forty-seven (47) Notice Packets have been
6 returned to our office by the U.S. Postal Service as undeliverable, ten (10) of which had a
7 forwarding address. For the Notice Packets returned from the post office without a forwarding
8 address, CPT attempted to locate a current mailing address using Accurint, one of the most
9 comprehensive address databases available for skip tracing. Accurint utilizes hundreds of
10 different databases supplied by credit supporting agencies, public records, and a variety of other
11 national databases.

12 9. As a result of a forwarding address, skip trace efforts and Class Member request,
13 a total of thirty-eight (38) Notice Packets were re-mailed to Class Members. As of the date of
14 this declaration, twelve (12) Notice Packets remain undeliverable with no forwarding address
15 and where no new address could be found through skip trace.

16 10. As of the date of this declaration, CPT has not received any disputes.

17 11. As of the date of this declaration, CPT has received one (1) written objection to
18 the Settlement from Wanda LaFontaine-Cabuto. The request was timely and valid. Attached as
19 Exhibit B is a copy of the Objection.

20 12. As of the date of this declaration, CPT has received three (3) requests for
21 exclusion. All requests were timely and valid. The three (3) Class Members who excluded
22 themselves from the settlement are Carrie McAbee, Dena Hall-Nelson, and Sophie Lim.
23 Attached as Exhibit C is a copy of the Requests for Exclusion.

24 13. Pursuant to the Settlement Agreement, the Individual PAGA Settlement
25 Payments will be made to all Class Members, including individuals who Request Exclusion
26 from the Settlement if they are PAGA Members.

14. Since it has received three (3) written requests for exclusion from the settlement, CPT will report that a total of one thousand six hundred and ninety-seven (1,697) Participating Class Members will be issued an Individual Settlement Payment. This represents a 99.82% participation rate.

15. Pursuant to the Settlement Agreement, the entire Net Settlement Amount was used to calculate the settlement payment amount for each Participating Class Member. The Net Settlement Amount is calculated as set forth below:

Gross Settlement Amount	\$5,000,000.00
Less Attorneys' Fees (Requested)	- \$1,666,666.00
Less Attorneys' Expenses (Requested)	- \$15,724.47
Less Service Award to Plaintiff (Requested)	- \$10,000.00
Less PAGA Payment to the LWDA	- \$187,500.00
<u>Less Settlement Administration Costs</u>	<u>- \$18,000.00</u>
Net Settlement Amount	\$3,102,109.53

16. Prior to the deduction of employee-side state and federal taxes, the average settlement payment, including PAGA, is estimated to be \$1,824.77. The highest settlement payment is estimated to be \$3,937.29 and the lowest estimated payment is \$12.98.

17. Prior to the deduction of employee-side state and federal taxes, the settlement payment, including PAGA, for Lead Plaintiff Taniya Abron is estimated to be \$2,589.98.

18. CPT will charge a total of \$18,000.00 in costs associated with the administration of the settlement. This includes all costs incurred to date, as well as estimated costs involved in completing the settlement.

/

/

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct and that this declaration is executed this 6th day of December 2023
3 at Irvine, California.
4

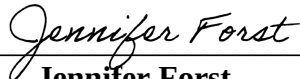
5 
6 Jennifer Forst
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

COURT APPROVED NOTICE OF CLASS ACTION SETTLEMENT AND HEARING DATE FOR FINAL COURT APPROVAL

Taniya Abron v. University Healthcare Alliance
 Superior Court of California, County of Alameda
 Case No. RG20066438

To: All current and former hourly-paid or non-exempt employees who worked for University Healthcare Alliance within the State of California at any time during the period from June 30, 2016 to March 11, 2022 (“Class Members”):

«FullName»
 «Address1» «Address2»
 «City», «State» «Zip»

PLEASE READ THIS NOTICE CAREFULLY

IT MAY AFFECT YOUR LEGAL RIGHTS

YOU MAY BE ENTITLED TO MONEY FROM THIS SETTLEMENT

I. INTRODUCTION

A proposed class action settlement (the “Settlement”) of the above-captioned action (the “Action”) filed in the Superior Court of the State of California, in and for the County of Alameda (the “Court”), has been reached by the parties and been granted preliminary approval by the Court on August 18, 2023.

A hearing will be held on December 29, 2023 at 9:00 a.m. (“Final Approval Hearing”) to determine whether the Settlement should be granted final approval.

University Healthcare Alliance’s (“UHA” or “Defendant”) records show that you were employed by UHA as an hourly-paid or non-exempt employee within the State of California at some time during the period from June 30, 2016 continuing up to and including March 11, 2022, and therefore are a Class Member in this Action. As a Class Member, you may be entitled to money under the Settlement and, if so, unless you request exclusion from the Settlement, your legal rights will be affected. The purpose of this Notice is to

- (1) describe the Action,
- (2) inform you of the terms of the Settlement, and
- (3) inform you of your rights and options in connection with the Settlement.

II. SUMMARY OF THE ACTION

On June 30, 2020, Taniya Abron (“Plaintiff”) filed a Class Action Complaint for Damages, thereby commencing a putative class action against UHA in the Alameda County Superior Court Case No. RG20066438 (referred to in this Notice as the “Complaint”).

In the operative Complaint, Plaintiff alleges that UHA failed to properly pay wages, failed to timely pay wages upon termination, failed to provide compliant wage statements, failed to provide lawful meal periods, failed to authorize and permit lawful rest periods, engaged in unfair business practices, and owes unpaid wages, civil and non-civil penalties, restitution, and reasonable attorney’s fees and costs. Plaintiff seeks, among other things, the recovery of allegedly unpaid wages and meal and rest period premiums, restitution, penalties, interest, attorneys’ fees, and costs.

UHA denies all of Plaintiff’s allegations and specifically denies that it violated the law in any way as described in the

lawsuit. Nothing in this Notice, or the Settlement itself, or any actions to carry out the terms of the Settlement, means that UHA admits any fault, guilt, negligence, wrongdoing or liability whatsoever. There has been no finding of any wrongdoing by UHA. UHA wishes to settle in order to avoid the costs, time, and disruption caused by litigation.

The Settlement is a compromise reached after good faith, arm's length negotiations between Plaintiff and Defendant, through their attorneys, and following participation in mediation before an experienced wage-and-hour mediator, as a result of which, the Plaintiff and UHA (collectively, the "Parties") reached a settlement. The Parties have since entered into a Class Action and PAGA Settlement Agreement ("Settlement Agreement"), which was preliminarily approved by the Court on August 18, 2023. The Court has preliminarily appointed Plaintiff Taniya Abron as representative of the Class ("Class Representative"), and has preliminarily appointed the following Plaintiff's counsel as counsel for the Class ("Class Counsel"):

JAMES HAWKINS, APLC
James R. Hawkins
Christina Lucio
9880 Research Drive, Suite 200
Irvine, California 92618
Tel: 949-387-7200
Fax: 949-387-6676

If you are a Class Member, you do not need to take any action to receive your pro rata share of the Net Settlement Amount (defined below) as provided by the Settlement ("Individual Class Payment"). You have the opportunity to opt-out or object to the Settlement if you so choose, as explained more fully in Sections V and VI below. Class Members who do not opt out of the Settlement by submitting a valid and timely request to be excluded from the Settlement ("Request for Exclusion"), as provided in Section V below, will be bound to the Class Settlement ("Settlement Class" or "Settlement Class Members").

The Settlement represents a compromise and settlement of highly disputed claims. Plaintiff and Defendant, and their respective counsel, have concluded and agree that, in light of the risks and uncertainties to each side of continued litigation, the Settlement is fair, reasonable and adequate, and is in the best interests of the Class Members.

III. SUMMARY OF SETTLEMENT TERMS

Settlement Amount. UHA has agreed to pay the amount of \$5,000,000 (the "Gross Settlement Amount") to fully resolve the claims against UHA in the Action. The Gross Settlement Amount includes all settlement payments to the Settlement Class Members, Class Counsel's attorney's fees, litigation costs and expenses, the Settlement Administration Expenses, and Service Payment to the Class Representative, as outlined below.

Settlement Administration and Other Payments. The portion of the Gross Settlement Amount that is available for payment to Settlement Class Members is referred to as the "Net Settlement Amount." The Net Settlement Amount will be the Gross Settlement Amount less the following payments, which the Court has tentatively approved subject to final approval at the Final Approval Hearing:

- **Settlement Administration Expenses.** Payment to the Settlement Administrator, estimated not to exceed \$18,000.00, for the expense of notifying the Class Members of the Settlement, processing Requests for Exclusion submitted by Class Members, Objections to the Settlement submitted by Settlement Class Members, calculating Individual Settlement Shares, and distributing settlement payments.
- **Attorney's Fees and Litigation Costs and Expenses.** Payment to Court-approved Class Counsel of reasonable attorney's fees in an amount not to exceed 1/3 (33.33%) of the Gross Settlement Amount (i.e., \$1,666,666) as reasonable compensation for the work Class Counsel performed in this Action, and will continue to perform through settlement finalization, together with reimbursement for actual litigation expenses and costs actually incurred in connection with the Action not to exceed \$1,686,666.00 ("Attorneys' Fees and Costs"). Class Counsel has been prosecuting the Action on behalf of Plaintiff and the

Settlement Class on a contingency fee basis (that is, without being paid any money to date) and has been paying all litigation costs and expenses.

- Service Award to Plaintiff Taniya Abron. A service award not to exceed \$10,000 to Plaintiff Taniya Abron to compensate her for services on behalf of the Class in initiating and prosecuting the Action. This payment is in addition to whatever payments Plaintiff is otherwise entitled to as a Settlement Class Member.

Calculation of Individual Settlement Shares. Class Members who do not submit a valid and timely Request for Exclusion will be entitled to a *pro rata* portion of the Net Settlement Amount (his/her “Individual Settlement Payment”), calculated based upon the number of weeks that each Settlement Class Member worked for UHA during the period of June 30, 2016 continuing up to and including March 11, 2022 (“Class Period”) based on UHA’s payroll records (“Workweeks”) divided by the total number of Workweeks worked by all Settlement Class Members and multiplied by the Net Settlement Amount.

Tax Matters. For taxation purposes, each Individual Settlement Share shall be allocated seventy five percent (75%) to penalties and interest to be reported on an IRS 1099 Form; and twenty five percent (25%) to wages to be reported on an IRS W-2 Form. Each Individual Settlement Share will be subject to reduction for employee-side taxes, withholdings, and deductions with respect to the wages portion of the Settlement. The employer’s portion of any payroll taxes and contributions with respect to the wages portion of the Settlement will be paid by UHA separately and in addition to the Gross Settlement Amount.

Releases. As of the Effective Date and UHA’s funding of the Gross Settlement Amount, all Class Members who do not submit a timely and valid Request for Exclusion (“Settlement Class Members”) will fully release and discharge Defendant United Healthcare Alliance and its present and former parent companies, subsidiaries, as well as its shareholders, officers, directors, employees, successors, predecessors, affiliates, and assigns, (“Released Parties”) from the “Released Claims” which arose during the period beginning June 30, 2016 and continuing up to and including March 11, 2022. The Released Claims specifically include, but are not limited to Labor Code §§ 201, 202, 203, 204, 218.6, 226, 226.7, 510, 512, 1194, 1197, the related IWC Wage Order No. 1-2001, C.C.P. § 1021.5, and Business & Professions Code §§ 17200, *et seq.*, claims based on alleged violations of these Labor Code and Wage Order provisions and all other claims, such as those under the California Labor Code, Wage Orders, regulations, and/or other provisions of law, that could have been pleaded based on the facts asserted in the Action. This includes claims for (1) failure to pay wages for all hours worked; (2) failure to provide lawful meal periods; (3) failure to authorize and permit lawful rest periods; (4) failure to timely pay wages due at termination; (5) failure to provide accurate itemized wage statements; (6) violation of California’s unfair competition law; (7) all related violations of the applicable Wage Orders; and (8) interest, fees, and costs (collectively, the “Released Claims”).

All Settlement Class Members are bound by this release. Class Members will be bound by this release unless they submit a valid and timely Request for Exclusion.

Conditions of Settlement. The Settlement is conditioned upon the Court entering an order at or following the Final Approving Hearing granting final approval of the Settlement.

IV. RECEIVING PAYMENT UNDER THE SETTLEMENT

If you do nothing, you will be deemed part of the Settlement Class, you will be issued payment from the Settlement, and you will release all Released Claims, as described in this Notice.

Based on Defendant’s internal records, which will be presumed to be correct unless evidence to the contrary is timely submitted to the Settlement Administrator:

**You worked «WorkWeeks» weeks during the time period from June 30, 2016 to March 11, 2022.
Your estimated gross Individual Settlement Payment is «estAmount».**

If you wish to dispute the number of Workweeks attributed to you, then you must submit a written, signed dispute, along with supporting documents, if any exist, to the Settlement Administrator at the below-listed address, which contains the following information: (1) a clear statement that you dispute the number of Workweeks credited to you and what you contend is the correct number to be credited to you; (2) all supporting documentation demonstrating that the number of Workweeks that you contend should be credited to you are correct, if any exist; (3) your full name; (4) your current address; (5) your telephone number; (6) the last four digits of your social security number; and (7) the name and number of the case (the case name is *Abron v. United Healthcare Alliance* and the Case Number is RG20066438).

The dispute must be postmarked no later than December 8, 2023.

Abron v. University Healthcare Alliance
 c/o CPT Group, Inc.
 50 Corporate Park
 Irvine, CA 92606
 Email: UHAABronSettlement@cptgroup.com
 Toll-Free Telephone: 1-888-498-1305

To ensure receipt of your payment, **it is your responsibility to make sure you keep the Settlement Administrator informed of your current mailing address**, and you may do so by contacting the Settlement Administrator by mail at the address listed above.

V. RIGHT TO REQUEST EXCLUSION

If you do not wish to participate in the Settlement, you may exclude yourself from the Settlement. **If you request exclusion from the Settlement, you will not receive an Individual Settlement Payment, and you will not be deemed to have released the Released Claims.** To request exclusion, you must submit a written Request for Exclusion to the Settlement Administrator at the address listed above in Section IV, that contains the following information: (1) a clear statement indicating your desire to be excluded from the Settlement, such as: “I do not want to be part of the settlement class in the *Abron v. United Healthcare Alliance* class action”; (2) your full name; (3) your current address; (4) your telephone number; (5) the last four digits of your social security number; and (6) the name and number of the case (the case name is *Abron v. United Healthcare Alliance* and the Case Number is RG20066438). The Request for Exclusion must be postmarked no later than December 8, 2023. Requests for Exclusion that do not include all required information or are postmarked after December 8, 2023 will be rejected, and those individuals will remain bound by the Settlement and the Release of Released Claims described above.

For your convenience, the Request for Exclusion form that is included with this Notice may be used by you to submit a Request for Exclusion.

If you do not timely submit a signed Request for Exclusion (as evidenced by the postmark), your Request for Exclusion will be rejected, you will be deemed a Settlement Class Member, and you will be bound by the release of Released Claims as described above and all other terms of the Settlement if the Settlement is granted final approval by the Court. If you timely submit a signed Request for Exclusion, you will have no further role in the Action, and you will not be entitled to any benefit as a result of the Action and Settlement, and you will not be entitled to or permitted to object to the Settlement.

VI. RIGHT TO OBJECT

Any Class Member who has not requested exclusion from the Settlement (i.e. any Settlement Class Member) and believes that the Settlement should not be finally approved by the Court for any reason, may object to the proposed Settlement and release of Released Claims. Objections must be mailed to the Settlement Administrator at the address listed above in Section IV, be signed, and be postmarked on or before December 8, 2023. All objections must state the Settlement Class Member’s (1) full name; (2) current address; (3) telephone number; (4) dates of employment with UHA.; (5) last four digits of his or her social security number; (6) the name and number of the case (the case name is *Abron v. United Healthcare Alliance* and the Case Number is RG20066438); and (7) describe why the objector objects

to the Settlement and release of Released Claims and whether the objector wishes to be heard at the Final Approval Hearing. For your convenience, the Notice of Objection Form that is included with this Notice may be used by you to submit an objection to the Settlement.

To object to the Settlement, you must remain a member of the Settlement Class, and if the Court approves the Settlement, you will be bound by the terms of the Settlement in the same way as Settlement Class Members who do not object. Any Settlement Class Member who does not object in the manner provided in this Notice will have waived any objection to the Settlement, whether by appeal or otherwise.

Settlement Class Members who mail timely notices of objection, which indicate that the Settlement Class Member wishes to be heard at the Final Approval Hearing, will have a right to appear at the Final Approval Hearing and have their objections heard by the Court at the hearing. Said Settlement Class Members have the right to appear either in person or through their own attorney, at their own expense, at this hearing. Objections not previously filed in writing in a timely manner as described above will not be considered by the Court.

VII. HEARING ON THE SETTLEMENT (“FINAL APPROVAL HEARING”)

The Final Approval Hearing on the adequacy, reasonableness and fairness of the Settlement will be held on December 29, 2023 at 9:00 a.m. in Department 21 of the Alameda Superior Court, located at Administration Building, 1221 Oak Street, Oakland, CA 94612. The Final Approval Hearing may be continued without further notice. In the event Final Approval is continued, Settlement Class Members who filed an objection will receive notice of the new hearing date.

You are not required to attend the final approval hearing, although any Settlement Class Member is welcome to attend the hearing. If you are objecting, you must comply with the requirements set forth above in Section VI, to have your objection heard by the Court.

If the Court grants final approval of the Settlement, notice of final judgment will be posted on the Settlement Administrator’s website <https://www.cptgroupcaseinfo.com/UHAAbronSettlement> within seven (7) calendar days after entry of the Final Order and Judgment.

VIII. ADDITIONAL INFORMATION

This Notice is only a summary of the Action and the Settlement. Settlement Class Members should contact the Settlement Administrator at **Abron v. United Healthcare Alliance, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA, 92606** with any concerns or questions regarding the Settlement. You may also refer to the pleadings, the Settlement Agreement, and other papers filed in the Action, which may be inspected in Department 21 of the Superior Court of the State of California, in and for the County of Alameda, located at Administration Building, 1221 Oak Street, Oakland, CA 94612, during regular business hours of each court day.

You may also access the Agreement online at:
<https://www.cptgroupcaseinfo.com/UHAAbronSettlement>

**PLEASE DO NOT CONTACT THE CLERK OF THE COURT OR THE JUDGE
 FOR INFORMATION REGARDING THIS SETTLEMENT.**

REQUEST FOR EXCLUSION

Taniya Abron v. University Healthcare Alliance
Superior Court of California, County of Alameda
Case No. RG20066438

*If you want to remain a member of the Participating Settlement Class and receive an Individual Settlement Payment, you should **not** fill out this form.*

This form is to be used only if you want to exclude yourself from the Settlement.

If you exclude yourself from the Settlement: (1) you will not share in any recovery paid to Participating Settlement Class Members as a result of the Settlement; (2) you will not be bound by any decision of the Court in the Action; (3) you may not object to the Settlement; and (4) you may pursue any claims asserted in the Action that you may have against University Healthcare Alliance by filing your own lawsuit.

If you want to request to be excluded from the Settlement, you must fill out this Request for Exclusion in its entirety, sign it, and return it to the Settlement Administrator at the address listed below by First Class U.S. Mail postmarked no later than **December 8, 2023**.

Abron v. University Healthcare Alliance
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Email: UHAABronSettlement@cptgroup.com
Toll-Free Telephone: 1-888-498-1305

Request for Exclusion

I confirm that I have received the Notice of Proposed Settlement of Class Action in the Action. I request to be excluded from the Settlement. I understand that by submitting this Request for Exclusion, I will not receive any money or other benefits under the Settlement, and will not be bound by the Settlement, including the release of Released Claims, as more fully described in the Settlement Agreement on file with the Court and Notice of Proposed Settlement of Class Action.

Please print legibly:

Name: _____

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

Date: _____

Signature

NOTICE OF OBJECTION FORM

Taniya Abron v. University Healthcare Alliance
Superior Court of California, County of Alameda
Case No. RG20066438

You should fill out this Notice of Objection Form *only* if you wish to object to the Settlement. Please note, you cannot submit this Notice of Objection Form, if you submit a Request for Exclusion. Objecting to the Settlement is simply telling the Court that you do not like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you do not want to be a part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

This form is to be used only if you wish to object to the Settlement. Settlement Class Members who do not timely make an objection will have waived their right to object to the Settlement.

If you wish to object to the Settlement, you must fill out this Notice of Objection Form in its entirety, sign it, and return it to the Settlement Administrator at the address listed below by First Class U.S. Mail postmarked no later than **December 8, 2023**. Settlement Class Members who wish to object to the Settlement may appear at the Final Approval Hearing to have your objection heard by the Court.

Abron v. University Healthcare Alliance
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Email: UHAABronSettlement@cptgroup.com
Toll-Free Telephone: 1-888-498-1305

Objection:

Please print legibly: Name: _____

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

The Reasons for the Objection: _____

Date: _____

Signature

EXHIBIT B

NOTICE OF OBJECTION FORM

Taniya Abron v. University Healthcare Alliance
Superior Court of California, County of Alameda
Case No. RG20066438

RECEIVED

OCT 30 2023

You should fill out this Notice of Objection Form *only* if you wish to object to the Settlement. Please note, you cannot submit this Notice of Objection Form, if you submit a Request for Exclusion. Objecting to the Settlement is simply telling the Court that you do not like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you do not want to be a part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

This form is to be used only if you wish to object to the Settlement. Settlement Class Members who do not timely make an objection will have waived their right to object to the Settlement.

If you wish to object to the Settlement, you must fill out this Notice of Objection Form in its entirety, sign it, and return it to the Settlement Administrator at the address listed below by First Class U.S. Mail postmarked no later than **December 8, 2023. Settlement Class Members who wish to object to the Settlement may appear at the Final Approval Hearing to have your objection heard by the Court.**

Abron v. University Healthcare Alliance
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Email: UHAAbronSettlement@cptgroup.com
Toll-Free Telephone: 1-888-498-1305

Objection:

Please print legibly: Name:

Wanda LaFontaine-Cabuto

Mailing Address:

City:

State:

Zip Code:

Telephone Number:

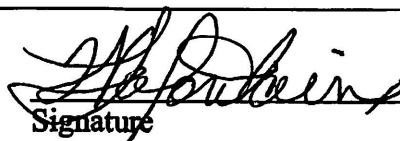
The Reasons for the Objection:

All of them.

Date:

10/22/23

Signature



Abron v University Healthcare Alliance

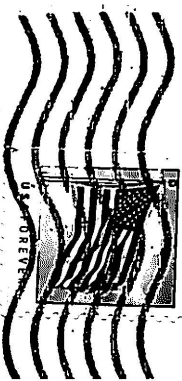
CaseNo:RG20066438



W. LaFontaine-Cabato

SACRAMENTO CA 957

27 OCT 2023 PM 5 L



Abrao V. University Healthcare Alliance
c/o CPT Group Inc.
50 Corporate Park
Irvine, CA 92606

RECEIVED

OCT 30 2023

92606-510550



EXHIBIT C

REQUEST FOR EXCLUSION

Taniya Abron v. University Healthcare Alliance
Superior Court of California, County of Alameda
Case No. RG20066438

RECEIVED

OCT 18 2023

If you want to remain a member of the Participating Settlement Class and receive an Individual Settlement Payment, you should not fill out this form.

This form is to be used only if you want to exclude yourself from the Settlement.

If you exclude yourself from the Settlement: (1) you will not share in any recovery paid to Participating Settlement Class Members as a result of the Settlement; (2) you will not be bound by any decision of the Court in the Action; (3) you may not object to the Settlement; and (4) you may pursue any claims asserted in the Action that you may have against University Healthcare Alliance by filing your own lawsuit.

If you want to request to be excluded from the Settlement, you must fill out this Request for Exclusion in its entirety, sign it, and return it to the Settlement Administrator at the address listed below by First Class U.S. Mail postmarked no later than **December 8, 2023**.

Abron v. University Healthcare Alliance
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Email: UHAABronSettlement@cptgroup.com
Toll-Free Telephone: 1-888-498-1305

Request for Exclusion

I confirm that I have received the Notice of Proposed Settlement of Class Action in the Action. I request to be excluded from the Settlement. I understand that by submitting this Request for Exclusion, I will not receive any money or other benefits under the Settlement, and will not be bound by the Settlement, including the release of Released Claims, as more fully described in the Settlement Agreement on file with the Court and Notice of Proposed Settlement of Class Action.

Please print legibly:

Name:

Carrie McAbee

Mailing Address:

City:

State:

Zip Code:

Telephone Number:

Date:

10/15/2023

Signature

Carrie L. McAbee

Abron v University Healthcare Alliance

CaseNo:RG20066438





Carrie Linville McAbee



OAKLAND CA 945

16 OCT 2023 PM 7 L



FREEDOM
FOREVER/USA

Abron v. University Healthcare Alliance

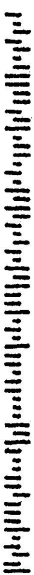
RECEIVED

OCT 18 2023

c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

ATTN: Settlement Administrator

92606-510550



REQUEST FOR EXCLUSION

Taniya Abron v. University Healthcare Alliance
Superior Court of California, County of Alameda
Case No. RG20066438

RECEIVED

OCT 20 2023

If you want to remain a member of the Participating Settlement Class and receive an Individual Settlement Payment, you should not fill out this form.

This form is to be used only if you want to exclude yourself from the Settlement.

If you exclude yourself from the Settlement: (1) you will not share in any recovery paid to Participating Settlement Class Members as a result of the Settlement; (2) you will not be bound by any decision of the Court in the Action; (3) you may not object to the Settlement; and (4) you may pursue any claims asserted in the Action that you may have against University Healthcare Alliance by filing your own lawsuit.

If you want to request to be excluded from the Settlement, you must fill out this Request for Exclusion in its entirety, sign it, and return it to the Settlement Administrator at the address listed below by First Class U.S. Mail postmarked no later than **December 8, 2023**.

Abron v. University Healthcare Alliance
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Email: UHAABronSettlement@cptgroup.com
Toll-Free Telephone: 1-888-498-1305

Request for Exclusion

I confirm that I have received the Notice of Proposed Settlement of Class Action in the Action. I request to be excluded from the Settlement. I understand that by submitting this Request for Exclusion, I will not receive any money or other benefits under the Settlement, and will not be bound by the Settlement, including the release of Released Claims, as more fully described in the Settlement Agreement on file with the Court and Notice of Proposed Settlement of Class Action.

Please print legibly:

Name: Dena Hall-Nelson

Mailing Address:

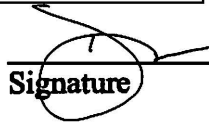
City:

State:

Zip Code:

Telephone Number:

Date: 10.16.2023


Signature

Abron v University Healthcare Alliance

CaseNo:RG20066438

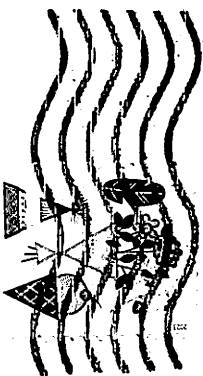


RECEIVED

OCT 20 2023

OKLAHOMA CITY OK 730

17 OCT 2023 PM 5 L



Abron v. University Health Care Alliance

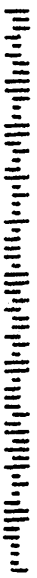
40 CPT Group Inc.

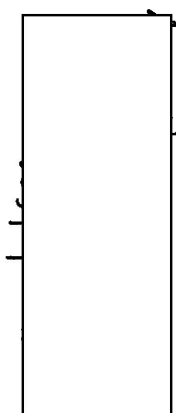
50 Corporate Park

Irvine, CA

92606

92606-510550





REQUEST FOR EXCLUSION

RECEIVED

Taniya Abron v. University Healthcare Alliance
Superior Court of California, County of Alameda
Case No. RG20066438

NOV 17 2023

*If you want to remain a member of the Participating Settlement Class and receive an Individual Settlement Payment, you should **not** fill out this form.*

*This form is to be used **only** if you want to exclude yourself from the Settlement.*

If you exclude yourself from the Settlement: (1) you will not share in any recovery paid to Participating Settlement Class Members as a result of the Settlement; (2) you will not be bound by any decision of the Court in the Action; (3) you may not object to the Settlement; and (4) you may pursue any claims asserted in the Action that you may have against University Healthcare Alliance by filing your own lawsuit.

If you want to request to be excluded from the Settlement, you must fill out this Request for Exclusion in its entirety, sign it, and return it to the Settlement Administrator at the address listed below by First Class U.S. Mail postmarked no later than **December 8, 2023**.

Abron v. University Healthcare Alliance
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Email: UHAABronSettlement@cptgroup.com
Toll-Free Telephone: 1-888-498-1305

Request for Exclusion

I confirm that I have received the Notice of Proposed Settlement of Class Action in the Action. I request to be excluded from the Settlement. I understand that by submitting this Request for Exclusion, I will not receive any money or other benefits under the Settlement, and will not be bound by the Settlement, including the release of Released Claims, as more fully described in the Settlement Agreement on file with the Court and Notice of Proposed Settlement of Class Action.

Please print legibly:

Name:

Sophie Lim

Mailing Address:

City:

State:

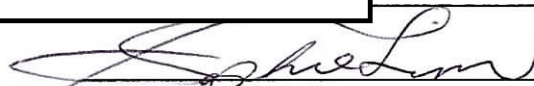
Zip Code:

Telephone Number:

Date:

11/15/2023

Signature



Abron v University Healthcare Alliance

CaseNo:RG20066438

Sophie Kim

RECEIVED

OAKLAND CA 946

15 NOV 2023 PM 4 L

NOV 17 2023



BY: _____

Abram V. University Healthcare Alliance
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

92606-510350





Superior Court of Alameda County Public Portal

Court Reservation Receipt

Reservation

Reservation ID:
949352402507

Status:
RESERVED

Reservation Type:
Motion (Motion for Final Approval of Class Action and
PAGA Action Settlement)

Number of Motions:
1

Case Number:
RG20066438

Case Title:
Abron VS University Healthcare Alliance, a California
corpor

Filing Party:
Taniya Abron (Plaintiff)

Location:
Rene C. Davidson Courthouse - Department 21

Date/Time:
December 29th 2023, 9:00AM

Confirmation Code:
CR-GXCGOU6NZMXEPSPZG

Fees

Description	Fee	Qty	Amount
Motion (name extension)	.00	1	.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount:
\$1.00

Type:
Visa

Account Number:
XXXX6358

Authorization:
06251D

Payment Date:
2023-09-06

[◀ Back to Main](#)[🖨 Print Page](#)

[Terms of Service](#)

[Contact Us](#)

[About this Site](#)

Copyright © Journal Technologies, USA. All rights reserved.



Superior Court of Alameda County Public Portal

Court Reservation Receipt

Reservation

Reservation ID:
949352402507

Status:
RESERVED

Reservation Type:
Motion (Motion for Final Approval of Class Action and
PAGA Action Settlement)

Number of Motions:
1

Case Number:
RG20066438

Case Title:
Abron VS University Healthcare Alliance, a California
corpor

Filing Party:
Taniya Abron (Plaintiff)

Location:
Rene C. Davidson Courthouse - Department 21

Date/Time:
December 29th 2023, 9:00AM

Confirmation Code:
CR-GXCGOU6NZMXEPSPZG

Fees

Description	Fee	Qty	Amount
Motion (name extension)	.00	1	.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount:
\$1.00

Type:
Visa

Account Number:
XXXX6358

Authorization:
06251D

Payment Date:
2023-09-06

[◀ Back to Main](#)[🖨️ Print Page](#)

[Terms of Service](#)

[Contact Us](#)

[About this Site](#)

Copyright © Journal Technologies, USA. All rights reserved.