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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

JOANNE MANALO, individually, on behalf
of herself and all other similarly situated
employees,

Plaintiff,

vs.

SAN JOSE, LLC, and DOES 1 to 5

Defendants.

**Electronically Filed
by Superior Court of CA,
County of Santa Clara,
on 9/29/2025 2:29 PM
Reviewed By: A. Floresca
Case #20CV371934
Envelope: 21026691**

Case No: 20CV371934

*Assigned for all Purposes to Hon. Theodore C.
Zayner, Department 19*

CLASS ACTION

**DECLARATION OF ROBERT SPENCER
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT**

Date: October 22, 2025
Time: 1:30 p.m.
Dept: 19

Complaint filed: October 23, 2020
FAC filed: April 25, 2024
Trial Date: TBD

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Attorneys for Plaintiff Joanne Manalo and
all other similarly situated employees

1 I, , ROBERT SPENCER, declare as follows:

2 1. I am an attorney duly admitted to the practice of law in the State of California. I
3 am an associate with the law firm Keller Grover LLP, co-counsel for Plaintiff Joanne Manalo
4 and proposed co-Class Counsel in this action. I have personal knowledge of the facts stated
5 herein and, if called as a witness, I could and would testify competently to the facts set forth
6 below.

7 2. On September 29, 2025, I personally provided the following documents to the
8 LWDA: 1) Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class and
9 PAGA Action Settlement and Memorandum of Points and Authorities in Support Thereof, 2)
10 Declaration of Eric A. Grover in Support of Motion for Preliminary Approval of Class and
11 PAGA Action Settlement, 3) Declaration of Alexei Kuchinsky in Support of Motion for
12 Preliminary Approval of Class and PAGA Action Settlement, 4) Declaration of William Klein in
13 Support of Motion for Preliminary Approval of Class and PAGA Action Settlement, 5)
14 Declaration of Joanne Manalo in Support of Motion for Preliminary Approval of Class and
15 PAGA Action Settlement, 6) Declaration of Michael Bui in Support of Motion for Preliminary
16 Approval of Class and PAGA Action Settlement, 7) Joint Stipulation of Class and PAGA Action
17 Settlement and Release of Claims, 8) the proposed order, and 9) this declaration.

18 I declare under penalty of perjury under the laws of the State of California and the United
19 States that the foregoing is true and correct, and that this Declaration was executed on this 29th
20 day of September, 2025 at San Francisco, California.

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22 _____
23 ROBERT SPENCER
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PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **September 29, 2025**, in the case of *Manalo v. Regional Medical Center of San Jose* Santa Clara County Superior Court Case No: 20CV371934, I served the foregoing document(s):

DECLARATION OF ROBERT SPENCER IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT

on the interested party(ies) below, using the following means:

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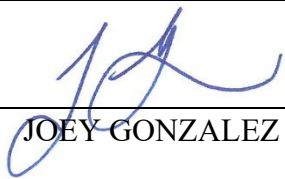
William P. Klein

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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


JOEY GONZALEZ