

KINGSLEY & KINGSLEY, APC
ERIC B. KINGSLEY, Esq., (SBN 185123)
eric@kingsleykingsley.com
KELSEY M. SZAMET, Esq., (SBN 260264)
kelsey@kingsleykingsley.com
JESSICA ADLOUNI, Esq., (SBN 328571)
jessica@kingsleykingsley.com
16133 Ventura Blvd., Suite 1200
Encino, CA 91436
Telephone: (818) 990-8300
Fax: (818) 990-2903

**JEFFER MANGELS BUTLER
& MITCHELL LLP**
R. SCOTT BRINK (Bar No. 138644)
rsb@jmbm.com
PATRICIA DESANTIS BELTON
(Bar No. 264655)
pbelton@jmbm.com
1900 Avenue of the Stars, 7th Floor
Los Angeles, California 90067-4308
Telephone: (310) 203-8080
Facsimile: (310) 203-0567

Attorneys for Defendant Hall
Ambulance Service, Inc.

LEONARD CARDER, LLP
AARON KAUFMANN, (SBN 148580)
akaufmann@leonardcarder.com
DAVID POGREL, (SBN 203787)
dpogrel@leonardcarder.com
1999 Harrison Street, Suite 2700
Oakland, CA 94612
Telephone: (510) 272-0169
Fax: (510) 272-0174

Attorneys for Plaintiffs JOEY STEPHENS, MANUEL
MARTINEZ, ERIC MCINTYRE, JEREMY CAPPS, and
TYLER IRISH, on behalf of themselves and all others
similarly situated

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

JOEY STEPHENS, MANUEL
MARTINEZ, ERIC MCINTYRE, JEREMY
CAPPS, and TYLER IRISH, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

HALL AMBULANCE, INC.; and DOES 1
thru 50, inclusive,

Defendants.

Case No. BCV-20-101643

**SUPPLEMENTAL DECLARATION OF
MAKENNA SNOW OF ILYM GROUP,
INC. REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION**

HEARING INFO

Date: September 12, 2023
Time: 8:30 a.m.

Judge: Hon. Thomas S. Clark
Dept.: 17

1 I, Makenna Snow declare as follows:

2 1. I am a resident of the United States of America and am over the age of 18. I am a
3 Case Manager for ILYM Group, Inc., (herein after referred to as “ILYM Group”), the professional
4 settlement services provider who has been retained by the Parties’ Counsel and subsequently
5 appointed by the Court to serve as the Settlement Administrator for the above captioned, *Stephens*
6 *v. Hall Ambulance Service, Inc.* matter. I am authorized to make this declaration on behalf of ILYM
7 Group and myself. I have personal knowledge of the facts herein, and, if called upon to testify, I
8 could and would testify competently to such facts.

9 2. ILYM Group has extensive experience in administering Class Action Settlements,
10 including direct mail services, database management, claims processing and settlement fund
11 distribution services for Class Actions ranging in size from 26 to 4.5 million Settlement Class
12 Members.

13 3. This declaration is intended to supplement the declaration executed on July 10,
14 2023, prior to the response deadline.

15 4. As of the date of this declaration, ILYM Group has received 10 requests for
16 exclusion. The deadline to request exclusion from the Settlement was July 14, 2023.

17 5. As of the date of this declaration, ILYM Group has not received any objections to
18 the Settlement. The deadline to file an objection to the Settlement was July 14, 2023.

19 6. As of the date of this declaration, ILYM has received 1 workweek dispute.

20 7. As of the date of this declaration, ILYM Group will report a total of 964
21 Participating Class Members, representing 98.97% of the 974 Settlement Class Members. The total
22 number of Workweeks worked by the Participating Class Members during the class period is
23 111,426.

24 8. Participating Class Members will receive a proportional share of the Net Settlement
25 Fund through individual settlement payments, based on the number of Workweeks worked by Class
26 Members during the Class Period. The Net Settlement Amount is the amount remaining after
27 deduction of the Court-approved payments from the Maximum Settlement Amount for Class
28

Counsel Fees and Litigation Costs, the Class Representative Enhancement Awards, Claims Administration Fees to ILYM Group, and the PAGA allocation, e.g.,

Maximum Settlement Amount	\$1,900,000.00
Attorney's Fees	\$633,333.33
Attorney's Costs	\$30,000.00
Enhancement Award - Joey Stephens	\$10,000.00
Enhancement Award - Manuel Martinez	\$10,000.00
Enhancement Award - Eric McIntyre	\$10,000.00
Enhancement Award - Jeremy Capps	\$10,000.00
Enhancement Award - Tyler Irish	\$10,000.00
ILYM Group Fees	\$17,132.80
LWDA	\$37,500.00
Amount to PAGA Group Members	\$12,500.00
Net Settlement Amount	\$1,119,533.87
<i>Class Members (70% of NSA)</i>	<i>\$783,673.71</i>
<i>Former Employees Sub-Class (30% of NSA)</i>	<i>\$335,860.16</i>

To determine a Participating Class Member's individual settlement award payment, the distribution shall be divided among all Class Members on a pro rata basis, based on the ratio of the Applicable Workweeks worked by each Class Member during the Class Period, to the total number of Applicable Workweeks worked by all Class Members during the Class Period. Based on these calculations, the Participating Class Members will receive an estimated average gross payment of \$812.94, with the estimated highest gross payment being \$2,524.89, and an estimated lowest gross payment of \$7.03. Additionally, Participating Former Employee Sub- Class Members shall receive an equal share of the portion of 30% of the Net Settlement Amount set aside for them. The estimated equal share for Participating Former Employee Sub- Class Members is \$596.55.

The PAGA payment shares to the PAGA Group Members will be calculated based on the PAGA Group Member's number of Pay Periods worked during the PAGA Period. The distribution will be divided among all PAGA Group Members on a pro rata basis, based on the ratio of the

1 Applicable PAGA Pay Periods worked by each PAGA Group Member during the PAGA Period,
2 to the total number of Applicable PAGA Pay Periods worked by all PAGA Group Members during
3 the PAGA Period. Based on these calculations, the PAGA Group Member's, will receive an
4 estimated average payment of \$19.03, with the estimated highest payment being \$32.45, and the
5 lowest payment of \$0.41.

6 9. ILYM Group's total fees and costs for services in connection with the administration
7 of this Settlement, which includes fees and costs incurred to-date, as well as anticipated fees and
8 costs for completion of the settlement administration, are \$17,132.80. ILYM Group's work in
9 connection with this matter will continue with the calculation of the settlement award payments,
10 issuance and mailing of the settlement award checks, the necessary tax filing and reporting on such
11 payments, and any other tasks that the Parties mutually agree to and/or the Court orders ILYM
12 Group to perform.

13 I declare under penalty of perjury under the laws of the State of California and the United
14 States that the foregoing is true and correct to the best of my knowledge and that this Declaration
15 was executed this 29th day of August 2023, at Tustin, California.

16
17 Makenna Snow
18 MAKENNA SNOW
19
20
21
22
23
24
25
26
27
28

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On September 5, 2023, I served all interested parties in this action the following documents described as: **SUPPLEMENTAL DECLARATION OF MAKENNA SNOW OF ILYM GROUP, INC. REGARDING NOTICE AND SETTLEMENT ADMINISTRATION** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

**JEFFER MANGELS BUTLER
& MITCHELL LLP**
R. SCOTT BRINK
rsb@jmbm.com
PATRICIA DESANTIS BELTON
pbelton@jmbm.com
1900 Avenue of the Stars, 7th Floor
Los Angeles, California 90067-4308

LEONARD CARDER, LLP
AARON KAUFMANN
akaufmann@leonardcarder.com
DAVID POGREL
dpogrel@leonardcarder.com
1999 Harrison Street, Suite 2700
Oakland, CA 94612

[] (BY MAIL) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) 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. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 5, 2023, at Woodland Hills, California.


Michelle Tanzer