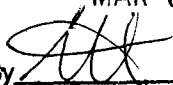


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4 Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

5 *Attorneys for Plaintiff and the Class*

FILED
SUPERIOR COURT
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

MAR 09 2023

By  Deputy

Amaris Morales Eumana

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN BERNARDINO**

11 THERESA BINGHAM, individually, and on
12 behalf of other members of the general public
13 similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act;

14 Plaintiff,

15 vs.

16 HERITAGE HEALTH CARE, INC., a
17 California corporation; and DOES 1 through
100, inclusive,

18 Defendants.
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Case No. CIVSB2029495

Honorable David S. Cohn
Department S26

CLASS ACTION

**DECLARATION OF THERESA
BINGHAM IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Plaintiff's Motion for Final Approval of
Class Action Settlement; Declaration of Class
Counsel (Edwin Aiwazian); Declaration of
Settlement Administrator (William Argueta);
and [Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: April 3, 2023
Time: 10:00 a.m.
Department: S26

Complaint Filed: December 30, 2020
FAC Filed: October 21, 2022
Trial Date: None Set

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documents as I could. I spent at least 12 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 6 hours reviewing the settlement agreement and about 7 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me an enhancement payment in the amount of \$9,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment as well as my share of the settlement as a class member and as an aggrieved employee.

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

Executed this ^{09/27} day of September 2022, at Redlands, California.

Electronically Signed 2022-09-27 23:59:46 UTC - 47.149.97.16
Nintex AssureSign® 9dd88d66-133c-428f-a187-a1f1d01711338

Theresa Bingham