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Attorneys for Plaintiff Laura Herrera, individually and on behalf of others similarly situated and other aggrieved employees

[ADDITIONAL COUNSEL LISTED AFTER CAPTION]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

LAURA HERRERA, VALERIE
CHAVEZ, individually and on behalf of
others similarly situated and other
aggrieved employees,

Plaintiffs,

v.

CASCADE LIVING GROUP
MANAGEMENT, LLC, an active
Washington Limited Liability Company;
BPM SENIOR LIVING COMPANY, an
active Delaware Corporation; and DOES
1 through 10,

Defendants.

Case No.: 20STCV48606 (related to
21STCV35724)

CLASS AND REPRESENTATIVE
ACTION

*[Assigned to Hon. Stuart M. Rice
in Dept. SS-1]*

**DECLARATION OF LAURA
HERRERA IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[FILED CONCURRENTLY WITH
NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL;
DECLARATION OF HAIK
HACOPIAN WITH EXHIBITS;
DECLARATION OF ZORIK
MOORADIAN; DECLARATION OF
JAMES R. HAWKINS;
DECLARATION OF VALERIE
CHAVEZ; AND [PROPOSED]
ORDER]

Date: August 14, 2023

Time: 10:30 a.m.

Dept.: SS-1

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Attorneys for Plaintiff, VALERIE CHAVEZ
on behalf of herself and all others similarly situated

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1 6. I have been involved with this case since March of 2020. In the over three years
2 I have been involved in this case, I have put a significant amount time and effort assisting my
3 attorneys and participating in this case. I have participated in three in-person meetings with my
4 attorneys as well as numerous telephonic conferences speaking to my attorneys and their staff.
5 I have also spent time looking for documents and speaking to other employees about the
6 lawsuit. I have also spent time reviewing the settlement agreement as well as this declaration.

7 7. In total, I estimate that I have spent approximately 13 hours to date participating
8 in this case.

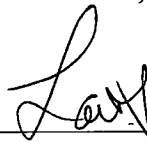
9 8. I understand that the parties have agreed to a \$10,000 service award to me for
10 coming forward and participating in this case and for providing a release of claims to Cascade
11 which includes more claims than what the other class members are releasing. I also understand
12 that any amounts payable to me must be approved by the Court.

13 9. I further understand that my individual claims against BPM, prior to June 13,
14 2019, are being separately resolved and that BPM has no part in the class settlement with
15 Cascade and vice versa. I understand that I had signed an arbitration agreement with BPM that
16 would not have allowed me to proceed with a class action against BPM.

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

19 Executed this 31st day of May 2023, at Pasadena, California.

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Laura Herrera