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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 VALERIE
CHAVEZ 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 LAURA
HERRERA; 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

I, Valerie Chavez, hereby declare as follows:

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

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

3 Executed this 14 day of June 2023, at City covina, California.

DocuSigned by:

Valerie Chavez

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Valerie Chavez

DECLARATION OF VALERIE CHAVEZ