

1 David Alami [SBN 314628]
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3 **ALAMI LAW GROUP**
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5 Attorneys for Plaintiff

6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **COUNTY OF LOS ANGELES**

8 KARLA IVON GONZALEZ, individually,
9 and on behalf of all other similarly situated,

10 Plaintiff,

11 vs.

12 LAKE BALBOA HEALTH CARE, INC., a
13 Nevada corporation; NAHS HOLDING,
INC., a Nevada corporation; NAHS
14 SOUTHEAST, INC., a Nevada corporation;
15 NAHS SOUTHWEST, INC., a Nevada
16 corporation; NORTH AMERICAN CLIENT
17 SERVICES, INC., a Nevada corporation;
NAHS NORTH, INC., a Nevada
corporation; and DOES 1 through 25,
inclusive,

18 Defendants.

CASE NO.: 21STCV11086

*Assigned for all purposes to the
Hon. Lawrence P. Riff*

Dept.: 51

19 **DECLARATION OF DAVID ALAMI IN**
20 **SUPPORT OF JOINT STIPULATION FOR**
21 **COURT APPROVAL OF SETTLEMENT OF**
22 **ACTION FILED PURSUANT TO PAGA**

1 I, David Alami, declare as follows:

2 1. I am an attorney at law duly licensed and admitted to practice before all courts of
3 the State of California. I am counsel for Plaintiff Karla Gonzalez ("Plaintiff") in this action. I have
4 personal knowledge of the facts set forth herein, which are known by me to be true and correct,
5 and if called as a witness, I could and would testify competently thereto.

6 2. I submit this Declaration in support of the parties' Joint Stipulation for Court
7 Approval of Settlement of Action Filed Pursuant to PAGA.

8 3. I am the managing partner at Alami Law Group. I was admitted to the California
9 Bar in 2017, received my J.D. from Loyola Law School, and my B.A. from University of
10 California, Irvine.

11 3. In litigation costs, my firm has spent at least \$5,200 on items such as filing fees,
12 copies, postage, mediation fees, and other fees related to the litigation. This does not include fees
13 for filing the present Joint Stipulation for approval of settlement.

14 3. On December 28, 2021, I submitted the settlement agreement in this matter to the
15 LWDA. That same day, I received an email confirming the submission of the settlement from the
16 DIR PAGA Unit. Attached hereto as **Exhibit A** and incorporated herein by reference is a true and
17 correct copy of that email.

18 4. Attached hereto as **Exhibit B** is a copy of the bid I received from Phoenix
19 Settlement Administrators for the administration of this settlement.

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

22 Executed on December 29, 2021, at Newport Beach, California.

23 *Dated: December 29, 2021*

ALAMI LAW GROUP

24
25 By 

26 David Alami
27 Attorneys for Plaintiff KARLA IVON GONZALEZ
28

EXHIBIT A

From: DIR PAGA Unit lwdadonotreply@dir.ca.gov
Subject: Thank you for your Proposed Settlement Submission
Date: December 28, 2021 at 1:26 PM
To: david@alamilawgroup.com

DU

12/28/2021 01:26:02 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

EXHIBIT B



PHOENIX
SETTLEMENT ADMINISTRATORS

CLASS ACTION SETTLEMENT SOLUTIONS

CASE ASSUMPTIONS

Class Members	1691
Total Claims Processed	1691
Subtotal Admin Only	\$7,500.00
WILL NOT EXCEED	\$7,500.00

Price good for Scope of Quote

December 29, 2021

Case: Lake Balboa - PAGA Settlement Administration

Phoenix Contact: Jodey Lawrence

Contact Number: 949.566.1455

Email: Jodey@phoenixclassaction.com

Requesting Attorney: David Alami

Firm: Alami Law Group

Contact Number: 949-922-1834

Email: David@amilawgroup.com

Assumptions and Estimate are based on information provided by counsel. If class size changes, PSA will need to adjust this Estimate accordingly. Estimate is based on 1541 Class Members. PSA assumes class data will be sent in Microsoft Excel or other usable format with no or reasonable additional formatting needed. A rate of \$150 per hour will be charged for any additional analysis or programming.

Case & Database Setup/ NCOA (USPS)/Language Translation				
Administrative Tasks:	Rate	Hours/Units		Line Item Estimate
Programming Manager	\$100.00	3		\$300.00
Programming Database & Setup	\$100.00	3		\$300.00
Toll Free Setup*	\$48.92	1		\$48.92
Call Center & Long Distance	\$0.99	169		\$167.41
NCOA (USPS)	\$200.00	1		\$200.00
		Total		\$1,016.33

Data Merger & Scrub				
Project Action	Rate	Hours/Units		Line Item Estimate
Notice Packet/Check Formatting	\$125.00	2		\$250.00
Data Merge & Duplication Scrub	\$0.05	1,691		\$84.55
		Total		\$334.55

* Prices good for 90 days. Subject to change with the USPS Rate or change in Notice pages or Translation, if any.

Mailing and Case Management				
Project Action:	Rate	Hours/Units		Line Item Estimate
Case Associate	\$120.00	4		\$480.00
QSF Bank Account Fees	\$95.00	3		\$285.00
Programming Calculations	\$125.00	4		\$500.00
Disbursement Review	\$125.00	3		\$375.00
Setup Printing Notice & Check	\$125.00	5		\$625.00
Notice & Check	\$0.75	1,691		\$1,275.01
Estimated Postage (up to 2 oz.)*	\$0.56	1,691		\$946.96
Skip Tracing Undeliverables	\$0.50	338		\$169.10
Remail Notice and Checks Packets	\$0.75	338		\$253.65
Estimated Postage	\$0.56	338		\$189.39
Programming Undeliverables	\$75.00	2		\$150.00
Reconcile Uncashed Checks	\$75.00	2		\$150.00
QSF Annual Tax Reporting *	\$750.00	1		\$750.00
		Total		\$6,149.12

* All applicable California State & Federal taxes, which include SUI, ETT, and SDI, and FUTA filings. Additional taxes are Defendant's responsibility.

Estimate Total: \$7,500.00