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11 *Attorneys for Plaintiff*

12 HECTOR ALMAZAN

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF LOS ANGELES – SPRING STREET**

15 HECTOR ALMAZAN, individually, and on
16 behalf of others similarly situated and as an
17 aggrieved employee and Private Attorney
18 General;

19 Plaintiffs,

20 v.

21 HATHAWAY-SYCAMORES CHILD AND
22 FAMILY SERVICE, a California non-profit
23 corporation; and DOES 1 through 100,
24 inclusive

25 Defendants.

Case No.: 21STCV12008

**SUPPLEMENTAL DECLARATION OF
MADELY NAVA OF APEX CLASS ACTION,
LLC IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: May 29, 2025

Time: 9:00 a.m.

Dept.: 6

Judge: Hon. Elihu M. Berle

1 I, Madely Nava, 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 Case Manager
3 for Apex Class Action, LLC, (hereinafter referred to as “Apex”), the professional settlement services
4 provider who has been appointed by the Court to serve as the Settlement Administrator for the
5 settlement in the above captioned *Almazan v. Hathaway-Sycamores Child and Family Services* matter.
6 On behalf of both Apex and myself, I possess the authority to issue this declaration. I am personally
7 acquainted with the information contained herein, and in the event of being summoned to provide
8 testimony, I am fully capable and willing to provide competent testimony regarding these facts.

9 2. Apex's team has over 15 years of combined experience administering class action settlements and
10 has successfully managed numerous cases. Apex has the technology and infrastructure to manage large-
11 scale class action settlements efficiently and accurately.

12 3. Apex was engaged by the Parties' Counsel and subsequently appointed by the Court to provide
13 notification and claims administration services pursuant to the Settlement terms. Apex's responsibilities
14 included: (a) printing and mailing the Notice of Proposed Class Action Settlement in English and Spanish
15 ("Notice Packet"); (b) receiving and processing Requests for Exclusion; (c) resolving disputes regarding
16 workweeks; (d) calculating individual settlement award amounts; (e) processing and mailing settlement
17 award checks; (f) handling tax withholdings and necessary filings; and (g) managing the distribution of
18 unclaimed funds and any additional tasks ordered by the Court.

19 4. On June 5, 2024, Plaintiff's Counsel provided Apex with the Court-approved Notice Packet
20 content. Apex formatted and finalized the Notice Packet with approval from the Parties' Counsel.

21 5. On June 18, 2024, Defendant's Counsel provided Apex with the class data file containing names,
22 social security numbers, last known addresses, and workweeks worked by each Settlement Class Member.
23 The Class List contained 890 individuals.

24 6. Apex updated the addresses through the United States Postal Service's National Change of Address
25 ("NCOA") database to ensure accurate mailing.

26 7. On August 7, 2024, Apex mailed the Notice Packet to all 890 Class Members via U.S. First-Class
27 Mail.

1 8. As of the date of this Declaration, Apex received 50 Notice Packets returned as undeliverable. A
2 skip trace located 42 updated addresses, and Apex re-mailed Notice Packets to those addresses. 3 Notice
3 Packets remain undeliverable after skip tracing.

4 9. Apex received four (4) valid Requests for Exclusion by the October 7, 2024, deadline.

5 10. Apex has not received any objections to the Settlement from Class Members.

6 11. After accounting for the four opt-outs, there are 886 Participating Class Members, representing
7 99.55% participation.

8 12. The total workweeks worked by Participating Class Members during the Class Period is 93,640.

9 13. The Net Settlement Amount available for distribution to Participating Class Members is
10 approximately \$223,510.00.

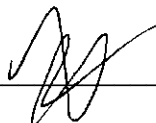
11 14. The highest Individual Settlement Amount is approximately \$691.39; the average is approximately
12 \$252.27; and the lowest is approximately \$2.10, subject to applicable withholdings.

13 15. Regarding the PAGA allocation, there are 607 Aggrieved Employees who worked 53,969 weeks
14 during the PAGA Period. The highest individual PAGA share is approximately \$40.30; the average is
15 approximately \$20.59; and the lowest is approximately \$0.23.

16 16. Apex's total administration fees and costs, covering incurred and anticipated expenses, are
17 \$13,990.00.

18 17. As of today's date, Apex has not received any additional Requests for Exclusion beyond the four
19 already reported, and has not received any objections to the Settlement.

20 I declare under penalty of perjury under the laws of the State of California and the United States
21 that the foregoing is true and correct and that this Declaration was executed this 28th day of April 2025,
22 in Irvine, California.

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25 MADELY NAVA
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