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LLC; SERRANO POST ACUTE, LLC; CORONA
7 POST ACUTE, LLC; CALIFORNIA POST
ACUTE LLC; LA FUENTE CARE POST ACUTE
8 LLC; MONROVIA POST ACUTE, LLC; and
ROYAL GARDENS HEALTHCARE, LLC
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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF LOS ANGELES**

12 JUNO CHUA, ON BEHALF OF HIMSELF AND ON
13 BEHALF OF ALL PERSONS SIMILARLY SITUATED,

14 PLAINTIFF,

15 v.

16 BEECAN HEALTH LLC, A CALIFORNIA LIMITED
LIABILITY COMPANY; SERRANO POST ACUTE,
17 LLC, A CALIFORNIA LIMITED LIABILITY COMPANY;
CORONA POST ACUTE, LLC, A CALIFORNIA
18 LIMITED LIABILITY COMPANY; CALIFORNIA
POST ACUTE LLC, A CALIFORNIA LIMITED
19 LIABILITY COMPANY; LA FUENTE CARE POST
ACUTE LLC, A CALIFORNIA LIMITED LIABILITY
20 COMPANY; MONROVIA POST ACUTE, LLC; A
CALIFORNIA LIMITED LIABILITY COMPANY;
21 ROYAL GARDENS HEALTHCARE, LLC, A
CALIFORNIA LIMITED LIABILITY COMPANY; AND
22 DOES 1 THROUGH 50, INCLUSIVE,

23 DEFENDANTS.
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CASE No: 21STCV24458

ASSIGNED FOR ALL PURPOSES TO:
JUDGE LAWRENCE P. RIFF, DEPT. SS-7

**DECLARATION OF KEVIN JACKSON IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 1, 2023
Time: 10:00 a.m.

CASE FILED: JULY 1, 2021

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DECLARATION OF KEVIN JACKSON

I, Kevin Jackson, declare as follows:

1. I am an attorney at licensed to practice before the Courts of the State of California and before this Court. I am senior counsel with the law firm of Foley & Lardner LLP, attorneys of record for Defendants Beecan Health LLC, Serrano Post Acute, LLC, Corona Post Acute, LLC, California Post Acute LLC, La Fuente Care Post Acute LLC, Monrovia Post Acute, LLC and Royal Gardens Healthcare, LLC (collectively, "Defendants"). The facts stated herein are within my personal knowledge or based upon information provided by Defendants to me in the course of this action. If called as a witness herein, I could and would testify competently thereto.

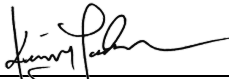
2. I have made a reasonable inquiry as to the existence of any class, representative, or other collective action in any other court in this or any other jurisdiction that asserts claims similar to those asserted in this action on behalf of a class or group of individuals who would also be members of the class defined in this action. To my knowledge there are no other actions currently pending against Defendants in this or any other jurisdiction asserting claims that will be extinguished or adversely affected by the Settlement in this action. In the interest of full disclosure, there is one pending action in the matter of *Nancy Mbakata v. One Click Care, LLC, et al.*, pending in the Los Angeles Superior Court as Case No. 21STCV14514. The Hon. Carolyn Kuhl, presiding over *Mbakata* matter, issued a minute order on September 20, 2021 finding that *Mbakata* matter is not related to this action; the Hon. Carolyn Kuhl, presiding over the instant action at the time, issued a similar order on October 20, 2021 in this action finding that it was not related to the *Mbakata* action. Although the *Mbakata* action also names as a defendant "Beecan Health, LLC," this action (*Chua*) is resolving claims on behalf of individuals who worked at one of seven different facilities named as Defendants in this action, none of whom are named as Defendants in the *Mbakata* case.

3. Defendants provided me with data confirming that there are 1,335 Class Members who collectively worked a total of 82,097 Workweeks (37,885 pay periods) and a total of 1,335 Aggrieved Employees who worked a total of 37,885 PAGA Pay Periods.

4. I am not aware of any actual or potential conflicts of interest with ILYM Group, the Administrator mutually selected by the Parties to administer the settlement in this action.

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

3 Executed on June 16, 2022, at San Diego, California.

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5 
6 Kevin Jackson