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Attorneys for PLAINTIFF and CLASS MEMBERS

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

SULLY MUNERA and VANESSA
ZAMUDIO, individually on behalf of all others
similarly situated

Plaintiffs,

vs.

HEALTH ACCESS FOR ALL INC. DOING
BUSINESS AS ANGELES COMMUNITY
HEALTH CENTER a California Corporation;
and DOES 1 through 25, Inclusive

Defendants.

Case No.: 21STCV19259

**SUPPLEMENTAL DECLARATION OF TROY
C. SKINNER IN SUPPORT OF UNOPPOSED
PRELIMINARY MOTION FOR APPROVAL OF
CLASS ACTION SETTLEMENT AND
SETTLEMENT PURSUANT TO PRIVATE
ATTORNEYS GENERAL ACT OF 2004**

Date: June 2, 2026
Time: 8:30 a.m.
Department: P

RESERVATION NO.: 643187253312

DECLARATION OF TROY SKINNER

I, Troy Skinner, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California. I am a member in good standing of the State Bar of California. I am counsel for Plaintiff in this action and have personal knowledge of the matters stated herein.

- 1 2. Following the filing of Plaintiff's Motion for Preliminary Approval of Class Action and
2 PAGA Settlement, the Parties identified several revisions and clerical corrections intended
3 to clarify and refine the settlement documents submitted to the Court.
- 4 3. The revisions to the Settlement Agreement include the following:
- 5 a. Section 1.12 (Class Period Definition) was revised to update the end date of the Class Period
6 from May 1, 2024 to the date of preliminary approval of the settlement;
- 7 b. Section 1.32 (PAGA Period Definition) was revised to update the end date of the PAGA
8 Period from May 1, 2024 to the date of preliminary approval of the settlement; and
- 9 c. Section 8 was revised to remove an inadvertent remaining template footnote artifact.
- 10 4. The revisions to the proposed Class Notice include the following:
- 11 a. Updating the Class Period and PAGA Period end dates to correspond with the revised
12 settlement definitions;
- 13 b. Removing outdated placeholder opt-out, objection, and final approval hearing dates that
14 were tied to prior projected hearing schedules;
- 15 c. Removing remaining bracketed template language and administrative placeholders; and
- 16 d. Correcting minor clerical and formatting issues.
- 17 5. Plaintiff submits that these revisions improve the clarity and administration of the
18 settlement documents and do not materially alter the substance of the settlement presented
19 for preliminary approval.

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct. Executed on May 7, 2026 at Ventura California.

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27 Troy Skinner
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