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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

CHANDRA FINGER, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

PROFESSIONAL REGISTRY HOLDINGS,
LLC, a California Limited Liability
Company; COACHELLA VALLEY
HEALTH PERSONNEL, an Entity
Unknown; KEVIN BASS, an Individual;
GEORGE TUCKER, an Individual, KIRVIN
SATTEWHITE, an Individual; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CVRI2101956
*[Assigned to the Hon. Judge Sunshine Sykes,
Dept 6, for all purposes]*

**DECLARATION OF CHRISTINE
MARTIN**

Hearing

Date: January 12, 2022
Time: 8:30 a.m.
Dept. 6

Reservation #: 379229112332

Complaint filed: 4/23/21
FAC filed: 6/15/21
SAC filed: 8/6/21

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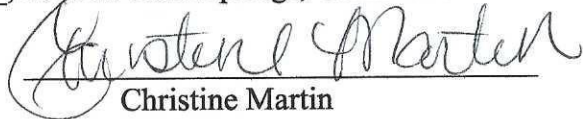
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1 of some putative class members who speak Spanish as their first language. However, I still believe
2 that these primarily Spanish speaking putative class members do speak English and read English at
3 a competent level. I do not speak a language other than English proficiently, nor is there any other
4 PRH personnel who regularly interact with the putative class members for administrative purposes
5 who speak a language other than English. I am not aware of any situation where a putative class
6 member could not adequately communicate with PRH based on some language barrier. I am also
7 not aware of any language barrier during my employment with PRH where the individuals receiving
8 care, including family members, could not adequately communicate with the caregivers.
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12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct.

14 Executed on December 13th, 2021 in Palm Springs, California.

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16 Christine Martin
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