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Attorneys for Plaintiff

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

SAMUEL ELLIOTT, individually, and on
behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

MED-DATA, INCORPORATED, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No. RIC1901865

Honorable Judge Sunshine S. Sykes
Department 6

CLASS ACTION

**DECLARATION OF HEATHER TIFFEE
ON BEHALF OF PROPOSED CY PRES
RECIPIENT VOLUNTARY LEGAL
SERVICES PROGRAM – EMPLOYMENT
LAW CLINIC**

[Notice of Motion and Motion for Preliminary
Approval of Class Action Settlement; Plaintiffs’
Compliance Chart in Support of Motion for
Preliminary Approval; Declaration of Proposed
Class Counsel (Edwin Aiwarzian); Declaration
of Proposed Class Representative (Samuel
Elliott); Declaration of Proposed Settlement
Administrator (Eric Springer); and [Proposed]
Order filed concurrently herewith]

Reservation: 006997607479

Date: December 1, 2021

Time: 8:30 a.m.

Department: 6

Complaint Filed: March 13, 2019

FAC Filed: September 9, 2021

Jury Trial Date: None Set

1 I, Heather Tiffée, hereby declare:

2 1. That I am an attorney at law, licensed to practice in the State of California, and am the
3 Managing Attorney of Capital Pro Bono ("CPB"), formerly Voluntary Legal Services Program
4 of Northern California. I have held this position since September 2020. In that capacity, I
5 oversee all client services and the operations of CPB.
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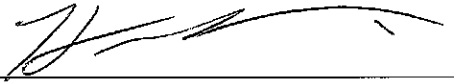
7 2. CPB is a 501(c)(3) nonprofit in good standing with the State of California that was
8 established in 1981 and incorporated in 1986 to provide free civil legal services to the indigent,
9 primarily through the use of volunteer attorneys. Our formal service area includes Sacramento,
10 Yolo, San Joaquin, El Dorado, and Placer counties. However, we also regularly provide
11 assistance, whether in person or by phone, to individuals residing outside those counties as long
12 as they reside in California. We changed our name in 2020 from Voluntary Legal Services
13 Program of Northern California ("VLSP") to Capital Pro Bono. CPB has been the recipient of
14 *cy pres* funds from several jurisdictions in the State of California pursuant to California Code of
15 Civil Procedure section 384.
16

17 3. If CPB is approved as a *cy pres* beneficiary, any funds received will be used to support or
18 Employment Law Clinic and Advice Line project, which assists the indigent with legal matters
19 related to their current or former employment. This assistance regularly includes, but is not
20 limited to, free legal advice regarding claims for unpaid wages, failure to provide meal and rest
21 periods, failure to pay reimbursement, and waiting time penalties. CPB provides legal advice,
22 assistance with legal forms, and direct representation in administrative hearings, including
23 hearings in front of the California Labor Commissioner for unpaid wages. We have a staff
24 attorney and clinic coordinator who provide assistance, along with experienced employment law
25 attorney volunteers.
26

27 4. These services have been a focus of our Employment Law Clinic and Advice Line project
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1 since its inception with VLSP and continuing through today under CPB. I believe these services
2 promote the law consistent with the objective of wage and hour class actions in general and in
3 this case specifically.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. Executed this 28th of October 2021 in Sacramento, California.

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10 Heather Tiffée
11 Managing Attorney
12 Capital Pro Bono
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