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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JENNIFER HORTA, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,

vs.

ROCKPORT HEALTHCARE SUPPORT
SERVICES, LLC, a California limited liability
company; ROCKPORT ADMINISTRATIVE
SERVICES, LLC, a California limited liability
company; ORANGE HEALTHCARE &
WELLNESS CENTRE, a California limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 21STCV34712

Honorable Kevin C. Brazile
Department 20

**DECLARATION OF JENNIFER
HORTA IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LAB. CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS, GENERAL RELEASE FEE,
AND SETTLEMENT
ADMINISTRATION COSTS**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Lab.
Code § 2698, *Et Seq.*); Settlement
Agreement and Award of Attorneys' Fees
and Costs; General Release Fee, and
Settlement Administration Costs;
Declaration of Plaintiff's Counsel (Brittany
Shaw) and [Proposed] Order and Judgment
filed concurrently herewith]

Reservation ID: 944797032379
Date: December 6, 2024
Time: 8:30 a.m.
Department: 20

Complaint Filed: September 20, 2021
Trial Date: None Set

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case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendants.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **1 hour** reviewing the settlement agreement and about **1 hour** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. Not only did I review and respond to discovery requests, but I also participated in providing information and a declaration in opposition to Defendants' motion to compel arbitration. I think my efforts helped to get the result obtained in this case.

7. For my broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Section 8(b) of the Settlement Agreement), the Settlement provides for a General Release Fee in the amount of \$15,000.00, to be paid out of the Total Settlement Amount, subject to Court approval. I respectfully request that the Court award me full payment of the General Release Fee.

8. I am not related to anyone associated with Lawyers *for* Justice, PC.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a general release fee, as well as my share of the settlement as an aggrieved employee.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this ^{09/24/2024} ____ day of September 2024, at Garden Grove, California.

Electronically Signed: 2024-09-24 18:19:51 UTC - 172.58.113.96
Jennifer Horta
Nintex AssureSign® 6ce1f42f-07fd-4420-8ae1-b1f50119999

Jennifer Horta