

1 Jason C. Ross (State Bar No. 252635)
jross@wshblaw.com

2 Valen M. Hermiz (State Bar No. 312356)
vhermiz@wshblaw.com

3 Ahllam H. Berri (State Bar No. 323123)
aberri@wshblaw.com

4 **WOOD, SMITH, HENNING & BERMAN LLP**
501 West Broadway, Suite 1200
5 San Diego, California 92101
6 Phone: 619-849-4900 ♦ Fax: 619-849-4950

7 Attorneys for Defendant, UROLOGIC
INSTITUTE OF HIGH DESERT, INC.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF SAN BERNARDINO, SAN BERNARDINO DISTRICT**

10 GUADALUPE GUARISTA, on behalf of the
11 State of California and other aggrieved
persons,

12 Plaintiff,

13 v.

14 UROLOGIC INSTITUTE OF HIGH
15 DESERT, INC., a California corporation; and
DOES 1 through 10, inclusive,

16 Defendants.

Case No. CIVSB2125029
[consolidated with CIVSB2133340]

**DECLARATION OF DR. PEDRAM
ILBEIGI**

[The Hon. Jessica Morgan, Dept. S-26]

Action Filed: 1/20/22

Trial Date: None Set

DECLARATION

I, Dr. Pedram Ilbeigi, declare as follows:

1. I am over 18 years of age. I know the following facts to be true of my own personal knowledge, and if called to testify, I could and would competently testify thereto.

2. This declaration is submitted pursuant to Section 6.1 of the Settlement Agreement.

3. I am the Chief Executive Officer of Urologic Institute of the High Desert, Inc. ("Defendant"), a defendant in the above-captioned lawsuit and party to the Settlement Agreement being presented to the Court for preliminary approval.

4. I submit this declaration to confirm I am not aware of any facts relevant to any actual or potential conflicts of interest with ILYM, which was selected by the Parties to administer the settlement.

5. I further submit this declaration to confirm I am not aware of any other pending matter or action asserting claims that would be extinguished or adversely affected by the settlement agreement reached by the Parties.

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

Executed this 8/5/24, at, Palmdale, California.


Dr. Pedram Ilbeigi

Guarista v. Urologic Institute of The High Desert, Inc., et al.
CIVSB2125029

PROOF OF SERVICE