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

GEANEE COLEMAN, individually, and on
behalf of other members of the general public
similarly situated; CHELSEA HANSEN,
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;

Plaintiffs,

vs.

ALEGRECARE, INC., an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case Nos.: RG20063958

Honorable Noël Wise
Department 21

CLASS ACTION

**DECLARATION OF CHELSEA HANSEN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION, ATTORNEYS' FEES AND
COSTS, AND ENHANCEMENT
PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action, Attorneys' Fees
and Costs, and Enhancement Payments;
Memorandum Of Points And Authorities
Declaration of Class Counsel
(Joanna Ghosh); Declaration of Class
Representative (Geanee Coleman); Declaration
of Settlement Administrator (Mary Butler); and
[Proposed] Final Approval Order and Judgment
filed concurrently herewith]

Date: April 12, 2024

Time: 9:00 a.m.

Department: 21

Complaint Filed: June 8, 2020

FAC Filed: August 21, 2020

SAC Filed: May 3, 2023

Trial Date: None Set

1 spent at least 9 additional hours speaking with my attorneys about the case, identifying potential
2 witnesses, providing my attorneys with documents and information concerning the case, and also
3 describing policies, practices, and procedures of Alegrecare.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about 5 hours reviewing the settlement
6 agreement and about 3 hours asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts helped to get the result obtained in this case, and
11 as a class and PAGA representative, I respectfully request that the Court award me an
12 Enhancement Payment in the amount of \$7,500.00 for my active participation in this case.
13 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
14 reasonable.

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

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this case. The only compensation I will receive is whatever amount
18 the Court awards as an enhancement award, as well as my share of the settlement as a class
19 member and as an aggrieved employee.

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

22 Executed this ^{08/18/2022} day of August 2022, at Sacramento, California.

23 Electronically Signed  2022-08-18 18:19:06 UTC - 172.58.35.153
Nintex AssureSign® 4e1daac8-525b-4477-857b-ae650121f6e0

24 Chelsea Hansen