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*Attorneys for Plaintiffs*

**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., a California  
Corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No. RG20063958

Honorable Evelio Grillo  
Department 21

**CLASS ACTION**

**DECLARATION OF CHELSEA  
HANSEN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

[Notice of Motion and Motion for  
Preliminary Approval of Class Action  
Settlement; Declaration of Proposed Class  
Counsel (Annabel Blanchard); Declaration of  
Class Representative (Geanee Coleman); and  
[Proposed] Order filed concurrently  
herewith]

Date: September 29, 2023  
Time: 9:00 am  
Department: 21

Complaint Filed: June 8, 2020  
FAC Filed: August 21, 2020  
Trial Date: None Set

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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 <sup>08/18/2022</sup> \_\_\_\_ 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-ae150121f6e9

24 Chelsea Hansen