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Attorneys for Plaintiffs

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

LAURA LOPEZ, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

BARLOW RESPIRATORY HOSPITAL, a
California corporation; and DOES 1 through
100,

Defendants.

Case No.: 21STCV29754 (Related to Case
Nos. 22STCV03831; 22STCV34472)

*[Assigned for all purposes to Hon. Carolyn
B. Kuhl, Dept. SSC-12]*

**DECLARATION OF ALEXANDRA R.
MCINTOSH IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: July 9, 2024
Time: 10:30 a.m.
Dept.: 12

Action Filed: August 12, 2021
Trial Date: None Set

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I, Alexandra R. McIntosh, declare as follows:

1. I am an associate with Haines Law Group, APC, and co-counsel for the named Plaintiffs Laura Lopez and Winifred Allison (“Plaintiffs”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I received a Bachelor of Arts degree from the University of California, Santa Barbara in 2012, and a Juris Doctor from the University of California, Irvine School of the Law in 2017. I was admitted to the California State Bar in June 2018. During law school, I worked at the plaintiff's employment law firm of Ackermann & Tilajef, P.C., where I assisted in representing clients in individual wrongful termination and retaliation lawsuits as well as wage and hour class actions. I also externed for Legal Aid at Work in their Wage Protection Program, where I was responsible for representing employees at hearings in front of the Labor Commissioner and assisted with litigating wage and hour class actions and representative PAGA actions.

3. After graduating from law school, I worked for Lara & Luna, APC, a plaintiff-side employment law firm, from June 2018 until March 2019. From March 2019 until March 2020, I worked as an associate at the employment law firm of Setareh Law Group. The vast majority of my work at both Lara & Luna APC and Setareh Law Group focused on representing employees in wage and hour actions, including wage and hour class actions and representative PAGA actions. Although non-exhaustive, the types of work I performed at those firms include: conducting client intakes; performing pre-filing research and analysis; drafting complaints; attending court hearings; corresponding with opposing counsel; drafting and responding to written discovery; preparing for and taking and defending depositions; analyzing payroll and timekeeping records and employee handbooks; drafting and opposing a variety of motions including motions for summary judgment, motions for remand, demurrers and motions to dismiss, motions to compel, and motions to decertify; drafting mediation briefs and attending mediations;

1 drafting long-form settlement agreements; drafting motions for preliminary and final settlement
2 approval; and overseeing the claims and/or opt-out processes.

3 4. Since April 2020 I have worked as an associate at my current firm, Haines Law
4 Group, APC. I am currently staffed on approximately thirty (30) active wage and hour class
5 actions in which I play a significant role.

6 5. The following is a non-exhaustive list of wage and hour class actions in which I
7 have been appointed as class counsel, and which have received final approval: *Cheyenne Robles*
8 *v. Western Stone & Metal Corp.*, Case No. MSC20-00392, California Superior Court, Contra
9 Costa County, Judge Edward G. Weil presiding (granted final approval of settlement on behalf of
10 employees at jewelry store involving claims for meal and rest period violations, direct wage
11 statement violations, and other claims); *Michael Ibarra v. Toyota Logistics Services, Inc.*, Case
12 No 20STCV29023, California Superior Court, Los Angeles County, Judge Ann I. Jones presiding
13 (granting final approval of settlement on behalf of employees at Toyota's manufacturing
14 warehouse involving claims for unpaid minimum and overtime wages, meal and rest period
15 violations, direct wage statement violations, and other claims); *Ignacio Flores v. McGrath*
16 *RentCorp, et al.*, Case No. RIC1906240, California Superior Court, County of Riverside,
17 Sunshine S. Sykes presiding (granting final approval of settlement involving claims for unpaid
18 wages, meal and rest period violations, and other claims); *Maria Hernandez v. Cold Steel, Inc.*,
19 Case No. 56-2020-00545301-CU-OE-VTA, California Superior Court, Ventura County, Judge
20 Vincent O'Neill presiding (granting final approval of settlement on behalf of employees at a
21 knives manufacturing facility involving claims for unpaid wages, meal and rest period violations,
22 and other claims); *Ulisses Lopez v. Good-West Rubber Corp., et al.*, Case No. CIVDS2011219,
23 California Superior Court, San Bernardino County, Judge David Cohn presiding (granting final
24 approval of settlement on behalf of employees at a rubber manufacturing facility involving claims
25 for unpaid minimum and overtime wages, meal and rest period violations, and other derivative
26 claims); *Edith Gutierrez v. Deltronic Corporation*, Case No. 30-2020-011-39890-CU-OE-CXC,
27 California Superior Court, Orange County, Judge Glenda Sanders presiding (granting final
28 approval of settlement on behalf of employees at a manufacturing facility involving claims for

1 unpaid minimum and overtime wages, meal and rest period violations, and other derivative
2 claims); *George Torres v. Arch Telecom, Inc.*, Case No. C20-01679, Contra Costa Superior Court,
3 Judge Edward Weil presiding (granting final approval of settlement on behalf of retail employees
4 involving claims for unpaid minimum and overtime wages, meal and rest period violations,
5 unpaid business expenses, and other derivative claims); *Luis Salinas v. Mitsubishi Materials*
6 *U.S.A. Corporation*, Case No. 3-2020-01139886-CU-OE-CXC, Judge Randall J. Sherman
7 presiding (granting final approval of settlement on behalf of employees at a car manufacturing
8 facility involving claims for unpaid minimum and overtime wages, facial wage statement
9 violations, and derivative waiting time penalties); and *Olegario Maldonado v. KRC Rock, Inc.*,
10 Case No. 37-2020-00015329-CU-OE-CTL, California Superior Court, San Diego County, Judge
11 Gregory W. Pollack presiding (granting final approval of settlement involving claims for unpaid
12 minimum and overtime wages, meal and rest period violations, and other derivative claims).

13 6. As counsel for Plaintiffs, I have been closely involved in all aspects of this
14 litigation. The details of the work completed by Class Counsel in this case are set forth in the
15 declaration of Sean M. Blakely, filed concurrently herewith.

16 I declare under penalty of perjury under the laws of California and the United States that
17 the foregoing is true and correct. Executed on May 24, 2024, at El Segundo, California.

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20 Alexandra R. McIntosh
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