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Attorneys for Defendants
MISSION HEALTHCARE SERVICES, LLC; HEALTHY
LIVING AT HOME - MONTEREY, LLC; HEALTHY
LIVING NETWORK RESOURCES, LLC

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF MONTEREY**

MELISSA HEBDON, on behalf of herself
and all similarly aggrieved employees,

Plaintiff,

v.

MISSION HEALTHCARE SERVICES,
LLC; HEALTHY LIVING NETWORK
RESOURCES, LLC; HEALTHY LIVING
AT HOME - MONTEREY, LLC; and DOES
1 through 50, inclusive,

Defendants.

Case No. 22CV000226

**DECLARATION OF PATRICIA
STAMBELOS IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Assigned for All Purposes to Hon. Carrie M.
Panetta, Dept. 14

Hearing Date: []

Time: 8:30 a.m.

Place: Dept. 14

I, Patricia T. Stambelos, declare and state as follows:

1. I am an attorney duly licensed to practice before all courts of the State of California. I am an attorney at the law firm Stambelos Law Office and counsel of record for Defendants Mission Healthcare Services, LLC; Healthy Living Network Resources, LLC; and Healthy Living at Home - Monterey, LLC (collectively "Mission" or "Defendants") in this action. I have personal knowledge of

1 the facts set forth in this Declaration and, if called as a witness, I could and would competently testify
2 about its contents.

3 2. On August 8, 2024, Defendants' experts analyzed and conveyed putative class member
4 data to Defense Counsel on which Defendants relied to negotiate and enter into a Joint Stipulation of
5 Class and Representative Action Settlement ("Settlement Agreement") in September 2024.

6 3. Plaintiffs filed their Motion for Preliminary Approval of Class Action Settlement on
7 September 13, 2024, relying on the numbers provided by Defendants on August 8, 2024.

8 4. On October 10, 2024, the Court entered its Tentative Ruling Granting the Motion for
9 Preliminary Approval of Class Action Settlement.

10 5. On October 28, 2024, in accordance with the terms of the Settlement Agreement,
11 Defendants provided Phoenix Settlement Administrators ("Phoenix") with a data file prepared by their
12 experts that contained names, last known mailing addresses, Social Security number, dates of
13 employment, and pay periods for each Class Member ("Class List") during the Class Period and PAGA
14 Period.

15 6. On November 4, 2024, Phoenix Settlement Administrators provided preliminary class
16 data to the parties. On the same date, Class Counsel notified Phoenix and Defense Counsel that the data
17 contained "significantly fewer class members/aggrieved employees than expected. There should be
18 approximately 2,671 aggrieved employees and 2,537 class members (with substantial overlap between
19 the groups)."

20 7. After receiving the communication from Class Counsel, Defense Counsel reviewed the
21 records and calculations and determined that their experts had inadvertently transposed numbers in their
22 data presentation and had failed to exclude duplicative information from the data set. This resulted in an
23 error in calculations that triggered the escalator clause in the Settlement Agreement.

24 8. On November 27, 2024, Defense Counsel provided a revised data file that contained the
25 correct information to Phoenix and Class Counsel. The corrected information did not trigger the
26 escalator clause in the Settlement Agreement.
27
28

9. The revised and corrected Class List contained 1,718 individuals identified as Class Members, who worked a total of 54,355 weeks during the Class Period, and 1,851 individuals identified as PAGA Employees, who worked 62,934 pay periods during the PAGA Period.

10. On November 27, 2025, Defense Counsel and Class Counsel approved the revised calculations.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration is executed on June 6, 2025, at Anahola, Hawaii.

DocuSigned by:
Patricia T. Stambelos
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Patricia T. Stambelos, Declarant