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Attorneys for Plaintiff and the Proposed Class

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

TIKOA CATER an individual, on behalf of
herself and others similarly situated

PLAINTIFF,

v.

SPEECH AND LANGUAGE PATHOLOGY
ASSOCIATES, INC.; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

CASE NO. 21STCV44618

[Case Assigned for All Purposes to Hon.
Kenneth R. Freeman in Dept. 14]

**DECLARATION OF TIKOA CARTER IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Date: October 10, 2023

Time: 10:00 A.M.

Dept.: 14

Complaint Filed: December 8, 2021

FAC Filed: May 19, 2022

Trial Date: None Set

DECLARATION OF TIKOA CATER

I, TIKOA CATER, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the Class Representative Plaintiffs in the matter of *TIKOA CATER, an individual, on behalf of herself and others similarly situated v. SPEECH AND LANGUAGE PATHOLOGY ASSOCIATES, INC.*; and DOES 1 thru 50, inclusive, Los Angeles County Superior Court, Case No. 21STCV44618. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Class Representative. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as a speech language therapist for SPEECH AND LANGUAGE PATHOLOGY ASSOCIATES, INC. (“Defendant” or “Speech and Language”). I generally worked in client’s homes.

3. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, in December 2021, I researched and identified Counsel that I believed could best represent the interests of the Class Members. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Speech and Language and provided all relevant employment documents in my possession. In addition, I attended a Zoom mediation on June 28, 2022. I participated in the discussions with the Class Counsel and shared my knowledge and insights in order to help the Class obtain a favorable settlement.

4. Throughout the entirety of this litigation, I have maintained regular contact with Class Counsel and assisted in any way possible by providing information and making myself available as needed.

5. I was aware that by helping to initiate this lawsuit, my name would become known and it was possible that my involvement in this matter could make it more difficult for me to obtain employment in this field. Regardless, I believed it was important to proceed with this matter on my behalf and on behalf of all others who were subject to the same problems during their

1 employment with Speech and Language.

2 6. Based upon my participation in this case, I understand the merits of this settlement
3 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
4 of the class. I believe this Settlement will benefit the Class.

5 7. It is my opinion that a fair and adequate Class enhancement for me as a Class
6 Representative is \$5,000. I believe that it is fair and reasonable in view of all of the work I have
7 performed in my role as a Class Representative. As Class Representative, I actively participated
8 in all stages of the litigation as detailed above and have always maintained the best interest of the
9 Class while performing my Class Representative duties.

10
11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct. Executed this 16 day of March, 2023
13 at Los Angeles, California.

14 DocuSigned by:



15 TIKOA CATER
16 Declarant

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(PROOF OF SERVICE)

[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On September 12, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF TIKOA CARTER IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

LEWIS BRISBOIS BISGAARD & SMITH LLP

Nima Darouian, Esq.

Nima.Darouian@lewisbrisbois.com

Sahra "Nadine" Agharezaei, Esq.

Sahra.Agharezaei@lewisbrisbois.com

633 West 5th Street, Suite 4000

Los Angeles, California 90071

[XX] BY ELECTRONIC MAIL THROUGH CASE ANYWHERE: On interested parties set forth on the attached service list.

[XX] (BY ELECTRONIC SERVICE): I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 12, 2023, at Encino, California.



Michelle Tanzer