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Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN BERNARDINO

ARMANDO FLORES and WILLIAM  
STOREY, individually, on a representative  
basis, and on behalf of all others similarly  
situated;

Plaintiffs,  
v.

SUNRISE RESPIRATORY CARE, INC., a  
California Corporation; SUNRISE  
RESPIRATORY MANAGEMENT GROUP,  
LLC, a California Limited Liability Company,  
MICHAEL EILBERT, OSCAR MUNOZ and  
DOES 1 through 20, inclusive;

Defendants.

Case No.: CIVSB2127592

*[Assigned to Hon. Judge Joseph T. Ortiz, Dept.  
S17, for all purposes]*

**DECLARATION OF KRISTINA BUI  
CARLSON, ESQ., IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Complaint filed: September 27, 2021

I, Kristina Bui Carlson, state and declare:

1. I am an attorney duly licensed to practice law in the State of California and am  
an Associate at Lauby, Mankin & Lauby LLP, attorneys for Plaintiffs in the above-entitled  
action. I am fully familiar with the facts of this case. The matters set forth herein are based  
upon my personal knowledge. I submit this declaration in support of Plaintiffs' Motion for  
Preliminary Approval of this Class Action Settlement and, if called upon as a witness, I could  
and would give competent testimony with respect to the matters contained herein.

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1           2.       For the sake of brevity, this declaration does not discuss the settlement itself, the  
2 procedural background of the litigation, the claims and investigation by my firm and co-  
3 counsel, and why the settlement is fair and reasonable. Those topics are covered in detail in  
4 the concurrently filed Declaration of Brian Mankin. This declaration simply provides  
5 information requested by the court as to why I am adequate class counsel.

6                                   **QUALIFICATION OF COUNSEL**

7           3.       I graduated from the University of Oregon School of Law in May 2013 and  
8 have been a member, in good standing, of the State Bar of California since December 2013. I  
9 am licensed to practice before all courts of the State of California and am admitted to practice  
10 in the United States District Court for the Central District of California and have litigated cases  
11 in various courts and counties throughout California, including the Court of Appeal.

12          4.       I began working at Fernandez & Lauby LLP (the predecessor of Lauby, Mankin  
13 & Lauby LLP) in September 2015 and, my current practice consists solely of representing  
14 employees. All of my current cases have been litigated as class actions, representative PAGA  
15 actions, or a combination of the two.

16          5.       I have been the handling attorney on nearly two dozen class action and/or  
17 representative PAGA actions. And, on these cases, myself and/or my firm have been  
18 appointed Class Counsel and have helped negotiate settlements totaling millions of dollars for  
19 our clients, the employees, and the State of California.

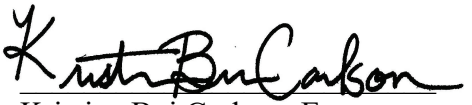
20                                   **CONCLUSION**

21          6.       As set forth above, I have litigated nearly two dozen class and representative  
22 actions, and have successfully resolved many of those cases, with many others still pending  
23 that will resolve in the future.

24          7.       For these reasons, as well as the facts and information presented in the  
25 concurrently filed Declaration of Brian J. Mankin, it is respectfully requested that the Court:  
26 (1) grant preliminary approval of the settlement as being fair, reasonable, and in the best  
27 interests of the class, (2) appoint Plaintiffs as the Class Representatives, (3) appoint Brian J.  
28 Mankin and Kristina Bui Carlson of Lauby, Mankin & Lauby LLP, as Class Counsel, and (4)

1 preliminarily approve the requested attorneys' fees, costs, and enhancement payment to the  
2 Class Representatives.

3 I declare under penalty of perjury under the laws of the State of California that the  
4 foregoing is true and correct. Executed on January 6, 2023 at Riverside, California.

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6 By:   
7 Kristina Bui Carlson, Esq.  
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