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Attorneys for Plaintiff Julia Garcia, individually and on behalf of other persons similarly situated and similarly aggrieved employees

[ADDITIONAL COUNSEL LISTED AFTER CAPTION]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JULIA GARCIA, JUAN MANUEL
CONTRERAS, individually and on behalf
of other persons similarly situated and
similarly aggrieved employees,

Plaintiffs,

v.

NEW VISTA NURSING OPERATOR,
LLC, an active California Limited
Liability Company; and DOES 1 through
10,

Defendants.

Case No.: 22STCV08228

CLASS AND REPRESENTATIVE
ACTION

*[Assigned to Hon. Kenneth R. Freeman
in Dept. SS-14]*

**DECLARATION OF JULIA GARCIA IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
REPRESENTATIVES' ENHANCEMENT
AWARDS, CLASS COUNSEL
ATTORNEYS' FEES AND COSTS,
SETTLEMENT ADMINISTRATION
COSTS, AND LWDA PAYMENT**

[FILED CONCURRENTLY WITH NOTICE
OF MOTION AND MOTION;
DECLARATION OF HAIK HACOPIAN;
DECLARATION OF ZORIK
MOORADIAN; DECLARATION OF
SHOHAM J. SOLOUKI; DECLARATION
OF LLUVIA ISLAS; DECLARATION OF
JUAN MANUEL CONTRERAS;
(PROPOSED) ORDER]

Date: December 17, 2024

Time: 10:00 a.m.

Dept.: SS-14

1 Shoham J. Solouki, Esq., CSB No.
2 shoham@soloukisavoy.com
3 SOLOUKI SAVOY LLP
4 316 West 2nd Street, Suite 1200
5 Los Angeles, California 90012
6 Phone: 213.814.4940
7 Fax: 213.814.2550

8 Attorneys for: Plaintiff JUAN MANUEL CONTRERAS, individually and on behalf
9 of other persons similarly situated and similarly aggrieved employees
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1 spending one hour each way for the commute. I have also participated in numerous telephonic
2 conferences speaking to my attorneys and their staff which included my periodic follow ups
3 about the case. I have also spent time reviewing the settlement agreement as well as this
4 declaration.

5 7. In total, I estimate that I have spent approximately 10 hours to date participating
6 in this case.

7 8. I understand that the parties have agreed to a \$10,000 service award to me for
8 coming forward and participating in this case and for providing a release of claims to New
9 Vista which includes more claims than what the other class members are releasing. I also
10 understand that any amounts payable to me must be approved by the Court and that the Court
11 may decide to award a lesser amount.

12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct.

14 Executed this 20 day of October 2023, at Calabasas, California.

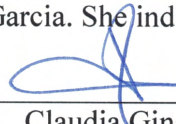
15
16
17 Julia Garcia

18 Julia Garcia

19 **Translation Authentication**

20 I, Claudia Ginsburg, am an employee of the Mooradian Law, APC, at 24007 Ventura Blvd.,
21 Suite 210, Calabasas, California 91302.

22 On October 20, 2023, I translated this Declaration from English to Spanish during a conference
23 with Julia Garcia. She indicated to me that she understood and signed the Declaration.

24 By: 

25 Claudia Ginsburg