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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 JUAN MANUEL
CONTRERAS 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
JULIA GARCIA; (PROPOSED) ORDER]

Date: December 17, 2024

Time: 10:00 a.m.

Dept.: SS-14

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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 staff which included my periodic follow ups about the case. I have also spent time reviewing
2 the settlement agreement as well as this declaration.

3 7. In total, I estimate that I have spent approximately 15 hours to date
4 participating in this case.

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

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

12 Executed this 13th day of November 2023, at Los Angeles, California.
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14 *Juan Manuel Contreras*
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16 Juan Manuel Contreras
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