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Attorneys for Plaintiffs Rosalba Rios, Juan Sosa, and Fenix Valle, on behalf of themselves and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA

ROSALBA RIOS, JUAN SOSA, AND
FENIX VALLE, on behalf of themselves and
all “aggrieved employees” pursuant to Labor
Code § 2698 *et seq.*,

Plaintiffs,

v.

PASCHEN MANAGEMENT
CORPORATION, a California corporation,
and DOES 1 through 10, inclusive,

Defendants.

CASE NO: 56-2022-00570446-CU-OE-VTA

*Assigned to the Hon. Mark S. Borrell, Dept.
40*

DECLARATION OF SERVICE

Date: March 13, 2024
Time: 8:30 A.M.
Dept.: 40

Complaint Filed: September 26, 2022

1 I am employed in Ventura County, State of California. I am over the age of eighteen
2 years and not a party to the within action. My business address is 4550 East Thousand Oaks
3 Boulevard, Suite 100, Westlake Village, CA 91362.

4 On February 20, 2024, I served the foregoing documents described as:

5 1. NOTICE OF UNOPPOSED MOTION AND MOTION FOR AN ORDER
6 APPROVING SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE PRIVATE
7 ATTORNEYS GENERAL ACT OF 2004, AWARDING ATTORNEYS' FEES, COSTS,
8 SERVICE AWARD PAYMENTS, AND REIMBURSEMENT OF SETTLEMENT
9 ADMINISTRATION EXPENSES, AND DISMISSING ACTION WITH PREJUDICE;
10 MEMORANDUM OF POINTS AND AUTHORITIES;

11 2. DECLARATION OF DANIEL F. GAINES IN SUPPORT OF UNOPPOSED
12 MOTION FOR AN ORDER APPROVING SETTLEMENT OF CLAIMS BROUGHT
13 PURSUANT TO THE PRIVATE ATTORNEYS GENERAL ACT OF 2004, AWARDING
14 ATTORNEYS' FEES, COSTS, SERVICE AWARD PAYMENTS, AND REIMBURSEMENT
15 OF SETTLEMENT ADMINISTRATION EXPENSES, AND DISMISSING ACTION WITH
16 PREJUDICE;

17 3. DECLARATION OF ROSALBA RIOS IN SUPPORT OF UNOPPOSED
18 MOTION FOR AN ORDER APPROVING SETTLEMENT OF CLAIMS BROUGHT
19 PURSUANT TO THE PRIVATE ATTORNEYS GENERAL ACT OF 2004, AWARDING
20 ATTORNEYS' FEES, COSTS, SERVICE AWARD PAYMENTS, AND REIMBURSEMENT
21 OF SETTLEMENT ADMINISTRATION EXPENSES, AND DISMISSING ACTION WITH
22 PREJUDICE;

23 4. DECLARATION OF JUAN SOSA IN SUPPORT OF UNOPPOSED MOTION
24 FOR AN ORDER APPROVING SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO
25 THE PRIVATE ATTORNEYS GENERAL ACT OF 2004, AWARDING ATTORNEYS'
26 FEES, COSTS, SERVICE AWARD PAYMENTS, AND REIMBURSEMENT OF
27 SETTLEMENT ADMINISTRATION EXPENSES, AND DISMISSING ACTION WITH
28 PREJUDICE;

1 5. DECLARATION OF FENIX VALLE IN SUPPORT OF UNOPPOSED
2 MOTION FOR AN ORDER APPROVING SETTLEMENT OF CLAIMS BROUGHT
3 PURSUANT TO THE PRIVATE ATTORNEYS GENERAL ACT OF 2004, AWARDING
4 ATTORNEYS' FEES, COSTS, SERVICE AWARD PAYMENTS, AND REIMBURSEMENT
5 OF SETTLEMENT ADMINISTRATION EXPENSES, AND DISMISSING ACTION WITH
6 PREJUDICE;

7 6. DECLARATION OF JODEY LAWRENCE IN SUPPORT OF UNOPPOSED
8 MOTION FOR AN ORDER APPROVING SETTLEMENT OF CLAIMS BROUGHT
9 PURSUANT TO THE PRIVATE ATTORNEYS GENERAL ACT OF 2004, AWARDING
10 ATTORNEYS' FEES, COSTS, SERVICE AWARD PAYMENTS, AND REIMBURSEMENT
11 OF SETTLEMENT ADMINISTRATION EXPENSES, AND DISMISSING ACTION WITH
12 PREJUDICE;

13 7. [PROPOSED] ORDER APPROVING SETTLEMENT OF CLAIMS
14 BROUGHT PURSUANT TO THE PRIVATE ATTORNEYS GENERAL ACT OF 2004,
15 AWARDING ATTORNEYS' FEES, COSTS, SERVICE AWARD PAYMENTS, AND
16 REIMBURSEMENT OF SETTLEMENT ADMINISTRATION EXPENSES, AND
17 DISMISSING ACTION WITH PREJUDICE; and

18 8. DECLARATION OF SERVICE
19 On the interested parties in this action by placing a true copy thereof enclosed in sealed
20 envelopes addressed as follows:

21 **Theodore E. Bacon, Esq.**
22 **tbacon@fbtlaw.com**
23 **FROST BROWN TODD LLP**
24 **235 Pine St, Ste 1150**
25 **San Francisco, CA 94104**

26 On the above date:

27 (BY ELECTRONIC SERVICE) Based on a court order or an agreement of the parties to
28 accept electronic service, I caused the documents to be sent to the persons at the electronic service
addresses listed above.

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1 On February 20, 2024, the above-stated documents were uploaded to the LWDA web portal:

2 **Labor & Workforce Development Agency**
3 **(Service via Online Submission to www.dir.ca.gov)**

4 (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be
5 delivered to the Labor & Workforce Development Agency via online process at the PAGA Filing
6 website (www.dir.ca.gov) in accordance with the procedure imposed by the LWDA.

7 I certify that the above document was printed on recycled paper.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed on February 20, 2024, at Westlake Village, California.

10
11 
12 AMELIA BOOTH