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7 Attorneys for Defendant
SANTA CLARITA VALLEY COMMITTEE ON AGING
8 CORPORATION, dba SCV SENIOR CENTER, a
California nonprofit corporation
9

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES**

12 JOSE VASQUEZ, individually, and on behalf of all
others similarly situated,

13 Plaintiff,

14 vs.

15 SANTA CLARITA VALLEY COMMITTEE ON
16 AGING CORPORATION, dba SCV SENIOR
CENTER, a California nonprofit corporation; and
17 DOES 1 through 100, inclusive,

18 Defendants.
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Case No. 25STCV06096

[Hon. Laura A. Seigle, Dept. 17]

**DECLARATION OF RANSOM
BOYNTON ON BEHALF OF SANTA
CLARITA VALLEY COMMITTEE ON
AGING CORPORATION RE: ACTUAL
AND POTENTIAL CONFLICTS OF
INTEREST WITH THIRD PARTY
ADMINISTRATOR**

Complaint Filed: March 4, 2025
Trial Date:

22 **DECLARATION OF RANSOM BOYNTON**

23 I, Ransom D. Boynton, say and declare as follows:

24 1. I am an attorney at law, duly licensed to practice before all the Courts of the State of
25 California, and I am an associate of the Koegle Law Group, APC. I serve as counsel of record to
26 Defendant SANTA CLARITA VALLEY COMMITTEE ON AGING CORPORATION (“SCVCOA”
27 or “Defendant”). I am familiar with the file in this matter and if called as a witness I could and would
28 competently testify to the following facts of my own personal knowledge.

1 2. I submit this declaration on behalf of SCVCOA regarding actual or potential conflicts
2 of interest with the Third Party Administrator (“TPA”), and other pending matters or actions asserting
3 claims that will be extinguished or adversely affected by the Settlement in this matter.

4 3. After a reasonable inquiry, I am unaware of any actual or potential conflicts of interest
5 with the TPA engaged to administer settlement in this action.

6 4. After a reasonable inquiry, including: (a) reviewing internal human resources and legal
7 files; (b) conferring with management regarding pending litigation; and (c) checking SCVCOA’s
8 records of claims, demands, and subpoenas, I am not aware of any class, representative, or other
9 collective action in any court asserting similar claims against SCVCOA.

10 5. SCVCOA is not a party to any related, overlapping, or similar action as described above.
11 Accordingly, there is no case name or case number to report, no procedural status to describe, and no
12 anticipated impact from any settlement in this case on any other case.

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

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16 Executed on Feb 27th, 2026, at Santa Clarita, California.

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19 Ransom Boynton, Esq.
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