

1 DAVID FISHMAN, SBN 217608
dfishman@brgslaw.com

2 ALEC DIMARIO, SBN 309811
adimario@brgslaw.com

3 BALLARD ROSENBERG GOLPER & SAVITT, LLP
15760 Ventura Boulevard, Eighteenth Floor

4 Encino, California 91436

Telephone: (818) 508-3700

5 Facsimile: (818) 506-4827

6 Attorneys for Defendants LAUREL CANYON
DIALYSIS, LLC, MISSION HILLS DIALYSIS,
7 LLC, AMERICAN RENAL CARE, LLC,
PARAG SHAH, and OMARAN ABDEEN
8

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11
12 ERLINDA PRADO, individually and on
behalf of all others similarly situated,,
13

14 Plaintiff,

15 vs.

16 LAUREL CANYON DIALYSIS, LLC, a
California Limited Liability Company;
MISSION HILLS DIALYSIS, LLC, a
17 California Limited Liability Company;
AMERICAN RENAL CARE, LLC, a
18 California Limited Liability Company;
PARAG SHAH, an individual, OMARAN
19 ABDEEN, an individual; and DOES 1 to 10,

20 Defendants.
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Case No. 25STCV08710

Assigned for All Purposes to:
Hon. Laura A. Seigle, Dept. 17

**DECLARATION OF DAVID J. FISHMAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
SETTLEMENT**

Action Filed:

March 25, 2025

Trial Date:

None Set

DECLARATION OF DAVID J. FISHMAN

I, David J. Fishman, declare as follows:

1. I am an attorney at law duly admitted to practice before all of the courts in the State of California. I am a Partner in the law firm of Ballard, Rosenberg, Golper & Savitt, LLP, attorneys of record herein for Defendants LAUREL CANYON DIALYSIS, LLC, MISSION HILLS DIALYSIS, LLC, AMERICAN RENAL CARE, LLC, PARAG SHAH, and OMARAN ABDEEN (“Defendants”). If called as a witness, I would and could competently testify to all facts within my personal knowledge except where stated upon information and belief. I make this declaration in support of Preliminary Approval of the Class Action settlement in the above-referenced action.

2. Through internal investigation, I have determined that Ballard, Rosenberg, Golper & Savitt, LLP, has no financial interest in ILYM Group, Inc., the third-party administrator proposed by the parties to administer the settlement agreement in this action. Further, neither Defendants nor Defendants’ counsel are aware of any facts relevant to any actual or potential conflicts of interest between Defendants or Ballard, Rosenberg, Golper & Savitt, LLP, with ILYM Group, Inc., the third party administrator selected by the parties to administer the settlement agreement in this action.

4. Counsel for the Parties agreed that there was no need for a Spanish language translation of the Notice to the settlement based on the lack of any evidence that any members of the settlement class are primarily Spanish speaking.

5. Other than this action, I am not aware of any other pending action asserting claims that will be extinguished or adversely affected by the settlement agreement in this action.

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

Executed on this 3rd day of December, at Encino, California.



David J. Fishman

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PROOF OF SERVICE

I am an attorney for the plaintiff herein, over the age of eighteen years, and not a party to the within action. My business address is Harris & Ruble, 655 N. Central Ave., 17th Floor, Glendale CA, 91203. On December 8, 2025, I served the within documents:

DECLARATION OF DAVID J. FISHMAN IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

Electronic Service: I caused the above-entitled document(s) to be served through Case Anywhere addressed to all parties appearing on the electronic service list for the above-entitled case and on the interested parties in this case:

David Fishman
BALLARD ROSENBERG GOLPER & SAVITT, LLP
15760 Ventura Blvd., 18th Floor
Encino, CA 91436
dfishman@brgslaw.com
adimario@brgslaw.com
laguilar@brgslaw.com
nmunn@brgslaw.com

For defendants: Laurel Canyon Dialysis, LLC.; Mission Hills Dialysis, LLC.; American Renal Care, LLC.; Parag Shah; and Omaran Abdeen

I declare under penalty of perjury that the above is true and correct. Executed on December 8, 2025, at Los Angeles, California.



Priya Mohan