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Attorneys for Plaintiff
ANDREA PRIOR

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

ANDREA PRIOR on behalf of herself, and all
aggrieved employees,

Plaintiff,

v.

ADVENTIST HEALTH CLEARLAKE
HOSPITAL, INC.; and DOES 1 through 10,
inclusive,

Defendants.

Case No: CV 423216

REPRESENTATIVE ACTION

**DECLARATION OF ROBERT W.
SPENCER IN SUPPORT OF MOTIONS
FOR AN ORDER APPROVING
SETTLEMENT OF PAGA ACTION AND
DISMISSING ACTION WITH
PREJUDICE AND FOR AN ORDER
AWARDING ATTORNEYS' FEES AND
COSTS, ENHANCEMENT PAYMENT,
AND SETTLEMENT ADMINISTRATION
FEES**

Date: August 19, 2024

Time: 9:00 a.m.

Dept. 1

Complaint filed: October 21, 2022

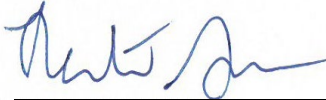
Trial: Not set

1 I, ROBERT W. SPENCER, declare as follows:

2 1. I am an attorney duly admitted to the practice of law in the State of California. I
3 am an associate with the law firm Keller Grover LLP, counsel for Plaintiff Andrea Prior in this
4 action. I have personal knowledge of the facts stated herein and, if called as a witness, I could
5 and would testify competently to the facts set forth below.

6 2. On July 19, 2024, I personally uploaded the following documents to the LWDA
7 website: 1) Notice of Motion and Motion for an Order Approving Settlement of PAGA Action
8 and Dismissing Action with Prejudice, 2) Memorandum of Points and Authorities in Support of
9 Motion for an Order Approving Settlement of PAGA Action and Dismissing Action with
10 Prejudice, 3) Notice of Motion and Motion for an Order Awarding Attorneys' Fees and Cost,
11 Enhancement Payments, and Settlement Administration Fees, 4) Memorandum of Points and
12 Authorities in Support of Motion for an Order Awarding Attorneys' Fees, Costs, Enhancement
13 Payment, and Settlement Administration Fees, 5) Declaration of Eric A. Grover in Support of
14 Motions for an Order Approving Settlement of PAGA Action and Dismissing Action with
15 Prejudice and for an Order Awarding Attorneys' Fees, Costs, Enhancement Payments and
16 Settlement Administration Fees, 6) Declaration of Andrea Prior, 7) the parties' Labor Code
17 Private Attorneys General Act Settlement Agreement, 8) the proposed order, and 9) this
18 declaration.

19 I declare under penalty of perjury under the laws of the State of California and the United
20 States that the foregoing is true and correct, and that this Declaration was executed on this 19th
21 day of July, 2024 at San Francisco, California.

22
23 
24 ROBERT SPENCER

PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On July 19, 2024, in the case of *Andrea Prior v. Adventist Health Clearlake Hospital, Inc.*, Lake County Superior Court Case Number CV 423216, I served the foregoing document(s):

DECLARATION OF ROBERT W. SPENCER IN SUPPORT OF MOTIONS FOR AN ORDER APPROVING SETTLEMENT OF PAGA ACTION AND DISMISSING ACTION WITH PREJUDICE AND FOR AN ORDER AWARDING ATTORNEYS' FEES AND COSTS, ENHANCEMENT PAYMENT, AND SETTLEMENT ADMINISTRATION FEES

on the interested party(ies) below, using the following means:

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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



JOEY GONZALEZ