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Attorneys for Plaintiff

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

NEVINE GIRGIS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

LIFE GENERATIONS HEALTHCARE LLC;
GHC OF AUBURN, LLC d.b.a. SIENA
SKILLED NURSING AND
REHABILITATION CENTER; GHC OF
CANOGA PARK, LLC d.b.a. CANYON OAKS
NURSING AND REHABILITATION
CENTER; GHC OF CONTRA COSTA, LLC
d.b.a. BAYBERRY SKILLED NURSING AND
HEALTHCARE CENTER; GHC OF DALY
CITY 102, LLC d.b.a. ST. FRANCIS HEIGHTS
CONVALESCENT HOSPITAL; GHC OF
DALY CITY 239, LLC d.b.a. ST. FRANCIS
CONVALESCENT PAVILION; GHC OF EL
CAJON, LLC d.b.a. BRADLEY COURT; GHC
OF HENDERSON, LLC d.b.a. HORIZON
RIDGE SKILLED NURSING AND
REHABILITATION CENTER; GHC OF
KEARNY MESA, LLC d.b.a. KEARNY MESA
CONVALESCENT AND NURSING HOME;
GHC OF LA MESA, LLC d.b.a. ARBOR
HILLS NURSING CENTER; GHC OF
LAKESIDE, LLC d.b.a. LAKESIDE SPECIAL

Case No.: 30-2022-01284746-CU-OE-CXC

*[Assigned for all purposes to the Hon.
William Claster, Dept. CX-101]*

**DECLARATION OF ALEXANDRA R.
MCINTOSH IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: May 10, 2024
Time: 9:00 a.m.
Dept.: CX-101

Complaint Filed: October 6, 2022
Trial Date: None Set

1 CARE CENTER; GHC OF LAKEVIEW
2 TERRACE, LLC d.b.a. LAKEVIEW TERRACE
3 SPECIAL CARE CENTER; GHC OF
4 LOMPOC, LLC d.b.a. LOMPOC SKILLED
5 NURSING AND REHABILITATION
6 CENTER; GHC OF LOS GATOS, LLC d.b.a.
7 PLUM TREE CARE CENTER; GHC OF
8 MODESTO, LLC d.b.a. ENGLISH OAKS
9 CONVALESCENT AND REHABILITATION
10 HOSPITAL; GHC OF NATIONAL CITY I,
11 LLC d.b.a. FRIENDSHIP MANOR NURSING
12 AND REHABILITATION CENTER; GHC OF
13 NATIONAL CITY II, LLC d.b.a. CASTLE
14 MANOR NURSING AND REHABILITATION
15 CENTER; GHC OF NEWPORT BEACH, LLC
16 d.b.a. NEWPORT NURSING AND
17 REHABILITATION CENTER; GHC OF
18 PLEASANTON, LLC d.b.a. PLEASANTON
19 NURSING AND REHABILITATION
20 CENTER; GHC OF SAC-RCFE, LLC d.b.a.
21 GRAMERCY COURT ASSISTED LIVING;
22 GHC OF SAC-SNF, LLC d.b.a. GRAMERCY
23 COURT SKILLED NURSING AND
24 REHABILITATION CENTER; GHC OF SAN
25 FRAN 180, LLC d.b.a. CITY VIEW POST
26 ACUTE; GHC OF SAN FRAN 68, LLC d.b.a.
27 LAWTON SKILLED NURSING AND
28 REHABILITATION CENTER; GHC OF SAN
JOSE, LLC d.b.a. VISTA MANOR NURSING
CENTER; GHC OF SAN RAFAEL, LLC d.b.a.
SMITH RANCH SKILLED NURSING AND
REHABILITATION CENTER; GHC OF
SANTEE, LLC d.b.a. STANFORD COURT
SKILLED NURSING AND
REHABILITATION CENTER; GHC OF
SUNNYVALE, LLC d.b.a. CEDAR CREST
NURSING AND REHABILITATION
CENTER; GHC OF TEM-RCFE, LLC d.b.a.
TEMECULA MEMORY CARE; GHC OF
TEM-SNF, LLC d.b.a. TEMECULA
HEALTHCARE CENTER; GHC OF UPLAND
RCFE, LLC d.b.a. HERITAGE COURT
ASSISTED LIVING; GHC OF UPLAND SNF,
LLC d.b.a. HERITAGE PARK NURSING
CENTER; GHC OF WALNUT CREEK, LLC
d.b.a. WALNUT CREEK SKILLED NURSING
AND REHABILITATION CENTER; GHC OF

SACRAMENTO, LLC; GHC OF NORTH-
MASTER, LLC; GHC of MASTER ANB-
FRESNO, LLC; GHC OF EL C-RCFE, LLC;
GHC of Fresno, LLC; GHC OF BLUE OAKS,
LLC; GHC OF ANBERRY, LLC; GHC OF
SAN JOSE NOTE, LLC; GHC OF STRIVE,
LLC; GHC OF TEMECULA, LLC; GHC OF
UPLAND DEMENTIA, LLC; California
Limited Liability Companies;; and DOES 1
through 100,

Defendants.

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I, Alexandra R. McIntosh, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Nevine Girgis (“Plaintiff”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I received a Bachelor of Arts degree from the University of California, Santa Barbara in 2012, and a Juris Doctor from the University of California, Irvine School of the Law in 2017. I was admitted to the California State Bar in June 2018. During law school, I worked at the plaintiff's employment law firm of Ackermann & Tilajef, P.C., where I assisted in representing clients in individual wrongful termination and retaliation lawsuits as well as wage and hour class actions. I also externed for Legal Aid at Work in their Wage Protection Program, where I was responsible for representing employees at hearings in front of the Labor Commissioner and assisted with litigating wage and hour class actions and representative PAGA actions.

3. After graduating from law school, I worked for Lara & Luna, APC, a plaintiff-side employment law firm, from June 2018 until March 2019. From March 2019 until March 2020, I worked as an associate at the employment law firm of Setareh Law Group. The vast majority of my work at both Lara & Luna APC and Setareh Law Group focused on representing employees in wage and hour actions, including wage and hour class actions and representative PAGA actions. Although non-exhaustive, the types of work I performed at those firms include: conducting client intakes; performing pre-filing research and analysis; drafting complaints; attending court hearings; corresponding with opposing counsel; drafting and responding to written discovery; preparing for and taking and defending depositions; analyzing payroll and timekeeping records and employee handbooks; drafting and opposing a variety of motions including motions for summary judgment, motions for remand, demurrers and motions to dismiss, motions to compel, and motions to decertify; drafting mediation briefs and attending mediations;

1 drafting long-form settlement agreements; drafting motions for preliminary and final settlement
2 approval; and overseeing the claims and/or opt-out processes.

3 4. Since April 2020 I have worked as an associate at my current firm, Haines Law
4 Group, APC. I am currently staffed on approximately thirty (30) active wage and hour class
5 actions in which I play a significant role.

6 5. The following is a non-exhaustive list of wage and hour class actions in which I
7 have been appointed as class counsel, and which have received final approval: *Cheyenne Robles*
8 *v. Western Stone & Metal Corp.*, Case No. MSC20-00392, California Superior Court, Contra
9 Costa County, Judge Edward G. Weil presiding (granted final approval of settlement on behalf of
10 employees at jewelry store involving claims for meal and rest period violations, direct wage
11 statement violations, and other claims); *Michael Ibarra v. Toyota Logistics Services, Inc.*, Case
12 No 20STCV29023, California Superior Court, Los Angeles County, Judge Ann I. Jones presiding
13 (granting final approval of settlement on behalf of employees at Toyota's manufacturing
14 warehouse involving claims for unpaid minimum and overtime wages, meal and rest period
15 violations, direct wage statement violations, and other claims); *Ignacio Flores v. McGrath*
16 *RentCorp, et al.*, Case No. RIC1906240, California Superior Court, County of Riverside,
17 Sunshine S. Sykes presiding (granting final approval of settlement involving claims for unpaid
18 wages, meal and rest period violations, and other claims); *Maria Hernandez v. Cold Steel, Inc.*,
19 Case No. 56-2020-00545301-CU-OE-VTA, California Superior Court, Ventura County, Judge
20 Vincent O'Neill presiding (granting final approval of settlement on behalf of employees at a
21 knives manufacturing facility involving claims for unpaid wages, meal and rest period violations,
22 and other claims); *Ulisses Lopez v. Good-West Rubber Corp., et al.*, Case No. CIVDS2011219,
23 California Superior Court, San Bernardino County, Judge David Cohn presiding (granting final
24 approval of settlement on behalf of employees at a rubber manufacturing facility involving claims
25 for unpaid minimum and overtime wages, meal and rest period violations, and other derivative
26 claims); *Edith Gutierrez v. Deltronic Corporation*, Case No. 30-2020-011-39890-CU-OE-CXC,
27 California Superior Court, Orange County, Judge Glenda Sanders presiding (granting final
28 approval of settlement on behalf of employees at a manufacturing facility involving claims for

1 unpaid minimum and overtime wages, meal and rest period violations, and other derivative
2 claims); *George Torres v. Arch Telecom, Inc.*, Case No. C20-01679, Contra Costa Superior Court,
3 Judge Edward Weil presiding (granting final approval of settlement on behalf of retail employees
4 involving claims for unpaid minimum and overtime wages, meal and rest period violations,
5 unpaid business expenses, and other derivative claims); *Luis Salinas v. Mitsubishi Materials*
6 *U.S.A. Corporation*, Case No. 3-2020-01139886-CU-OE-CXC, Judge Randall J. Sherman
7 presiding (granting final approval of settlement on behalf of employees at a car manufacturing
8 facility involving claims for unpaid minimum and overtime wages, facial wage statement
9 violations, and derivative waiting time penalties); and *Olegario Maldonado v. KRC Rock, Inc.*,
10 Case No. 37-2020-00015329-CU-OE-CTL, California Superior Court, San Diego County, Judge
11 Gregory W. Pollack presiding (granting final approval of settlement involving claims for unpaid
12 minimum and overtime wages, meal and rest period violations, and other derivative claims).

13 6. As counsel for Plaintiff, I have been closely involved in all aspects of this
14 litigation. The details of the work completed by Class Counsel in this case are set forth in the
15 declaration of Paul K. Haines, filed concurrently herewith.

16 I declare under penalty of perjury under the laws of California and the United States that
17 the foregoing is true and correct. Executed on April 11, 2024, at El Segundo, California.

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20 Alexandra R. McIntosh
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