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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

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

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

**DECLARATION OF SEAN. M. BLAKELY
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 OF LAKESIDE, LLC d.b.a. LAKESIDE
2 SPECIAL CARE CENTER; GHC OF
3 LAKEVIEW TERRACE, LLC d.b.a.
4 LAKEVIEW TERRACE SPECIAL CARE
5 CENTER; GHC OF LOMPOC, LLC d.b.a.
6 LOMPOC SKILLED NURSING AND
7 REHABILITATION CENTER; GHC OF
8 LOS GATOS, LLC d.b.a. PLUM TREE
9 CARE CENTER; GHC OF MODESTO, LLC
10 d.b.a. ENGLISH OAKS CONVALESCENT
11 AND REHABILITATION HOSPITAL; GHC
12 OF NATIONAL CITY I, LLC d.b.a.
13 FRIENDSHIP MANOR NURSING AND
14 REHABILITATION CENTER; GHC OF
15 NATIONAL CITY II, LLC d.b.a. CASTLE
16 MANOR NURSING AND
17 REHABILITATION CENTER; GHC OF
18 NEWPORT BEACH, LLC d.b.a. NEWPORT
19 NURSING AND REHABILITATION
20 CENTER; GHC OF PLEASANTON, LLC
21 d.b.a. PLEASANTON NURSING AND
22 REHABILITATION CENTER; GHC OF
23 SAC-RCFE, LLC d.b.a. GRAMERCY
24 COURT ASSISTED LIVING; GHC OF SAC-
25 SNF, LLC d.b.a. GRAMERCY COURT
26 SKILLED NURSING AND
27 REHABILITATION CENTER; GHC OF
28 SAN FRAN 180, LLC d.b.a. CITY VIEW
POST ACUTE; GHC OF SAN FRAN 68,
LLC d.b.a. LAWTON SKILLED NURSING
AND 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.

1 I, SEAN M. BLAKELY, declare as follows:

2 1. I am a Partner at the Haines Law Group, APC, and counsel for the named Plaintiff
3 Nevine Girgis ("Plaintiff") and the proposed Settlement Class in the above-captioned matter. I
4 am a member in good standing of the bar of the State of California and am admitted to practice
5 in this Court. I have personal knowledge of the facts stated in this declaration and could testify
6 competently to them if called upon to do so.

7 2. I am a 2008 graduate of Southwestern Law School. I was admitted to the
8 California State Bar in September 2009. From December 2010 to September 2011, I worked as
9 a Law Clerk for Rose, Klein & Marias, a civil litigation firm in Long Beach, California. At Rose,
10 Klein & Marias I assisted trial attorneys in employment and personal injury cases. From
11 September 2011 to May 2016, I worked as an associate at the employment law firm of Mahoney
12 Law Group, APC in Long Beach, California. The vast majority of my work at Mahoney Law
13 Group, APC focused on representing employees in wage and hour class actions. My work at
14 Mahoney Law Group, APC also included representing employees in individual claims for
15 wrongful termination, harassment, discrimination, and retaliation. Although non-exhaustive, the
16 types of work I performed at Mahoney Law Group, APC included: conducting client intakes;
17 performing pre-filing research and analysis; drafting complaints; attending court hearings;
18 corresponding with opposing counsel; drafting and responding to written discovery; preparing
19 for and taking and defending depositions; analyzing payroll and timekeeping records and
20 employee handbooks; opposing motions for summary judgment, as well as a variety of other
21 motions such as motions for remand, demurrers and motions to dismiss, motions to strike,
22 motions to compel, motions to quash, and motions for class certification; drafting mediation
23 briefs, attending mediations; drafting long-form settlement agreements; drafting motions for
24 preliminary and final settlement approval; and overseeing the claims process.

25 3. Since November 8, 2016, I have worked at my current firm, Haines Law Group,
26 APC, where, in 2020, I became a Partner. I am currently responsible for managing over forty
27 (40) active wage and hour class and representative actions in both state and federal court.

28 4. The following is a non-exhaustive list of wage and hour class actions in which I

1 have been appointed as class counsel and/or played a significant role in prosecuting the litigation,
2 and which have received final approval: *Santimateo v. Sun Healthcare Group, Inc., et al*, Case
3 No. BC471884, California Superior Court, Los Angeles County, Judge Jane L. Johnson presiding
4 (granted final approval of settlement on behalf of employees at rehabilitation facility involving
5 claims for unpaid wages and meal and rest period violations, and other claims, in which I was
6 approved at an hourly rate of \$325 for work performed in 2012-2013); *Teyuca v. Pacific Alliance*
7 *Medical Center, Inc.*, California Superior Court, Los Angeles County, Judge William F.
8 Highberger presiding (granting final approval of settlement on behalf of healthcare workers for
9 unpaid wages, meal and rest period violations, and other claims, in which I was approved at an
10 hourly rate of \$325 for work performed in 2012-2013); *Arteaga v. Command Center Security,*
11 *Inc.*, Case No. BC480496, California Superior Court, Los Angeles County, Judge John Shepard
12 Wiley, Jr. presiding (granting final approval of settlement on behalf of security guards involving
13 claims for unpaid overtime, meal and rest period violations, and other claims, in which I was
14 approved at an hourly rate of \$425 for work performed in 2012-2015); *Casadine v. Maxim*
15 *Healthcare Services, Inc.*, Case No. CV 12-10078-DMG (CWx), United States District Court,
16 Central District of California, Judge Dolly M. Gee presiding (granting final approval of settlement
17 on behalf of home health care employees involving claims for unpaid wages and other claims, in
18 which I was approved at an hourly rate of \$425 for work performed in 2012-2015); *Guzman v.*
19 *Andrew Lauren Interiors, Inc., et al.*, Case No. BC567757, California Superior Court, Los
20 Angeles County, Judge Elihu M. Berle presiding (granting final approval of settlement on behalf
21 of construction workers involving claims for unpaid wages, meal and rest period violation, and
22 other claims, in which I was approved at an hourly rate of \$425 for work performed in 2014-
23 2016); *Booker v. The Goodyear Tire and Rubber Company*, Case No. BC498399, California
24 Superior Court, Los Angeles County, Judge Amy Hogue presiding (granting final approval of
25 settlement on behalf of tire mechanics involving claims for unpaid wages, meal and rest period
26 violations, and other claims, in which I was approved at an hourly rate of \$425 for work performed
27 in 2013-2015); *Nunez v. CompuCom Systems, Inc.*, Case No. BC618385, California Superior
28 Court, Los Angeles County, Judge John Shepard Wiley, Jr. presiding (granting final approval of

1 settlement on behalf of IT support workers for overtime, meal and period, reimbursement, and
2 related violations, approved at hourly rate of \$475 for work performed in 2016 and 2017); *Galvan*
3 *v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC, California
4 Superior Court, Orange County, Judge William D. Claster presiding (granting final approval of
5 settlement on behalf of non-exempt employees of a chemical manufacturing company involving
6 claims for unpaid overtime and waiting time penalties); *Razon v. TTM Technologies, Inc., et al.*,
7 Case No. 37-2016-00038326-CU-OE-CTL, California Superior Court, San Diego County, Judge
8 Gregory W. Pollack presiding (granting final approval of settlement involving claims for unpaid
9 overtime wages, wage statement violations, and meal period violations); *Blank v. Coty, Inc., et*
10 *al.*, Case No. BC624850, California Superior Court, Los Angeles County, Judge Williams F.
11 Highberger presiding (granting final approval of settlement involving claims for wage statement
12 violations, meal period violations, and other claims); *Morales v. Caremeridian, LLC, et al.*, Case
13 No. BC593191, California Superior Court, Los Angeles County, Judge William F. Highberger
14 presiding (granting final approval of settlement on behalf of direct support professionals
15 involving claims for unpaid wages, meal and rest period violations, wage statement violations,
16 and other claims); *Aguilar v. Act Fulfillment, Inc.*, Case No. RIC1616643, California Superior
17 Court, Riverside County, Judge Sharon J. Waters presiding (granting final approval of settlement
18 on behalf of non-exempt factory workers involving claims for meal period violations); *Sandoval*
19 *v. AMCOR Flexibles Inc.*, Case No. BC617499, California Superior Court, Los Angeles County,
20 Judge Kenneth R. Freeman presiding (granting final approval of settlement on behalf of
21 manufacturing employees involving claims for unpaid wages, meal period violations, rest period
22 violations, and waiting time penalties); *Le v. GBW Railcar Services, L.L.C.*, Case No.
23 RIC1612209, California Superior Court, Riverside County, Judge Sharon J. Waters presiding
24 (granting final approval of settlement on behalf of non-exempt employees of a freight railcar
25 manufacturer involving claims for unpaid overtime and minimum wages, meal period violations,
26 and rest period violations); *Silva v. ADJ Products, LLC*, Case No. BC618581, California Superior
27 Court, Los Angeles County, Judge William F. Highberger presiding (granting final approval of
28 settlement involving claims for unpaid overtime and minimum wages, rest period violations,

wage statement violations, and waiting time penalties); *Lira v. Discus Dental, LLC, et al.*, Case No. CIVDS1620402, California Superior Court, San Bernardino County, Judge David Cohn presiding (granting final approval of settlement on behalf of non-exempt manufacturing employees involving claims for unpaid minimum and overtime wages, meal and rest period violations, and other claims); *Gonzales v. PathPoint*, Case No. BC657147, California Superior Court, Los Angeles County, Judge Carolyn B. Kuhl presiding (granting final approval of settlement on behalf of non-exempt direct support professionals involving claims for meal and rest period violations and other claims); *Duran v. PRADA USA CORP.*, Case No. BC644319, California Superior Court, Los Angeles County, Judge Maren E. Nelson presiding (granting final approval of settlement on behalf of non-exempt commissioned salespersons involving claims for unpaid overtime wages, meal and rest period violations, failure to reimburse for necessary expenditures, and other claims); *Banegas v. UPM, Inc.*, Case No. BC644438, California Superior Court, Los Angeles County, Judge Carolyn B. Kuhl presiding (granting final approval of settlement on behalf of non-exempt manufacturing employees involving claims for unpaid wages, meal and rest period violations, and other claims); *Palafox v. Pacific Line Clean-Up, Inc.*, Case No. 30-2017-00921632-CU-OE-CXC, California Superior Court, Orange County, Judge William D. Claster presiding (granting final approval of settlement on behalf of non-exempt employees involving claims for unpaid overtime wages, meal and rest period violations, and other claims); *Janet Arroyo v. AST Sportswear, Inc., dba Bayside Apparel Manufacturing, Inc.*, Case No. 30-2017-00909663-CU-OE-CXC, California Superior Court, Orange County, Judge Glenda Sanders presiding (granting final approval of settlement on behalf of non-exempt garment employees involving claims for unpaid minimum wages, meal and rest period violations, and other claims); *Carlos Garcia v. Fabrica International, Inc.*, Case No. 30-2017-00949461-CU-OE-CXC, California Superior Court, Orange County, Judge William D. Claster presiding (granting final approval of settlement on behalf of non-exempt manufacturing employees involving claims for unpaid minimum and overtime wages, meal and rest period violations, and statutory penalties); *Jonathan Leon v. Piercey West, Inc.*, Case No. BC656874, California Superior Court, Los Angeles County, Judge Amy D. Hogue presiding (granting final approval of settlement on behalf

1 of non-exempt commissioned salespersons and other employees involving claims for unpaid
2 wages, meal and rest period violations, unreimbursed business expenses, and other claims); and
3 *Matthew Tovar, et al. v. Rentokil North America, Inc.*, Case No. BC676386, California Superior
4 Court, Los Angeles County, Judge Daniel J. Buckley presiding (granting final approval of
5 settlement on behalf of non-exempt employees involving claims for unpaid overtime, meal and
6 rest break violations, and other claims); *Seungmin Samantha Lee v. Infor (US) Inc.*, Case No.
7 CGC-18-566393, California Superior Court, San Francisco County, Judge Ethan P. Schulman
8 presiding (granting final approval of settlement on behalf of sales development representatives
9 involving claims for unpaid overtime, meal and rest period violations, and penalty claims); *Tracy*
10 *Aguilar, et al. v. Aero Port Services, Inc.*, Case No. BC659234, California Superior Court, Los
11 Angeles County, Judge Carolyn B. Kuhl presiding (granting final approval of settlement on behalf
12 of non-exempt employees involving claims for meal and rest period violations, and other claims);
13 *Carlos Perez, et al. v. Moss Bros. Auto Group, Inc., et al.*, Case No. RIC1709905, California
14 Superior Court, Riverside County, Judge Sunshine S. Sykes presiding (granting final approval of
15 settlement on behalf of non-exempt commissioned salespersons involving claims for unpaid
16 wages, meal and rest period violations, other claims); *Julio Alfaro v. Orange Automotive d/b/a*
17 *Kia of Orange*, Case No. 30-2017-00945105-CU-OE-CXC, California Superior Court, Orange
18 County, Judge Randall J. Sherman presiding (granting final approval settlement on behalf of non-
19 exempt commissioned employees involving claims for unpaid wages, meal and rest period
20 violations, unreimbursed business expenses, and penalty claims); *Sepulveda, et al. v. Caliber*
21 *Collision Transport Service LLC, et al.*, Case No. BC669786, California Superior Court, Los
22 Angeles County, Judge Carolyn B. Kuhl presiding (granting final approval of settlement on behalf
23 of non-exempt commissioned employees involving claims for unpaid wages, meal and rest period
24 violations, and penalty claims); *Mariela Cruz v. Traina Dried Fruit, Inc.*, Case No. 9000819,
25 California Superior Court, Stanislaus County, Judge Marie Sovey Silveira presiding (granting
26 final approval of settlement on behalf of non-exempt employees involving claims for unpaid
27 wages, meal and rest period violations, and penalty claims); *Joshua Anthony v. Semper Solaris*
28 *Construction Inc.*, Case No. 37-2018-00035320-CU-OE-CTL, California Superior Court, San

1 Diego County, Judge Gregory W. Pollack presiding (granting final approval of settlement on
2 behalf of non-exempt employees involving claims for overtime wages, wage statement penalties,
3 waiting time penalties, and PAGA civil penalties); *Fabio Gallo v. Coast Composites, LLC*, Case
4 No. 30-2018-01016120-CU-OE-CXC, California Superior Court, Orange County, Judge Glenda
5 Sanders presiding (granting final approval of settlement on behalf of non-exempt employees
6 involving claims for wage statement violations and PAGA civil penalties); *Maria Jessenia*
7 *Gomez, et al. v. CareMeridian, LLC*, Case No. BC655730, California Superior Court, Los
8 Angeles County, Judge William F. Highberger presiding (granting final approval of settlement
9 on behalf of non-exempt nursing employees involving claims for meal and rest period violations,
10 minimum and overtime violations, and penalty claims); *Alfredo Villarreal v. Spenuzza, Inc.*, Case
11 No. RIC1902836, California Superior Court, Riverside County, Judge Sunshine S. Sykes
12 presiding (granting final approval of settlement on behalf of non-exempt manufacturing
13 employees involving claims for unpaid wages, meal and rest period violations, and various
14 penalty claims); *Rosalie A. Wayman v. San Fernando Valley Automotive, LLC, et al.*, Case No.
15 19STCV35904, California Superior Court, Los Angeles County, Judge Maren E. Nelson
16 presiding (granting final approval of settlement on behalf of commission-based employees
17 involving claims for unpaid minimum wages, meal and rest period violations, and penalty claims);
18 *Danielle Bradley Queen, et al. v. Unlimited Quest, Inc.*, Case No. CIVDS1716151, California
19 Superior Court, San Bernardino County, Judge David Cohn presiding (granting final approval of
20 settlement on behalf of non-exempt Direct Support Professionals and Program Supervisors
21 involving claims for rest period violations, unpaid wages, failure to reimburse for necessary
22 business expenditures, wage statement violations, and other penalty claims); *Fabian Santana, et*
23 *al. v. A.M. Cabinets, Inc.*, Case No. 19STCV00803, California Superior Court, Los Angeles
24 County, Judge Daniel J. Buckley presiding (granting final approval of settlement on behalf of
25 non-exempt employees involving claims for unpaid wages, meal and rest period violations, wage
26 statement violations, failure to reimburse for necessary business expenditures, and other penalty
27 claims); *Jonathan Reyes-Delcid v. SNS Transportation Services Inc.*, Case No. BC683026, Judge
28 Daniel J. Buckley presiding (granting final approval of settlement on behalf of non-exempt

employees involving claims for piece-rate violations, unpaid wages, meal and rest period violations, failure to reimburse for necessary business expenditures, and other penalty claims); *Damien Dana Council v. Professional Courier & Newspaper Distribution, et al.*, Case No. BC715054, California Superior Court, Los Angeles County, Judge Amy D. Hogue presiding (granting final approval of settlement on behalf of non-exempt employees involving claims for unpaid wages, meal and rest period violations, and various penalty claims); and *Jose Jimenez v. Fenceworks, Inc.*, Case No. 30-2018-01034150-CU-OE-CXC, California Superior Court, Orange County, Judge William D. Claster presiding (granting final approval of settlement on behalf of non-exempt employees involving claims for piece-rate violations, unpaid wages, meal period violations, and various penalty claims).

5. I have also moved to certify and have received an order certifying a class action in *Ontiveros v. Safelite Fulfillment, Inc., et al.*, Case No. CV 15-7118-DMG (RAOx), United States District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six classes of employees for rest period violations, wage statement violations, meal period violations, and overtime and double-time violations); and *Vazquez v. Kraft Heinz Foods Company*, Case No. 16-CV-02749-WQH (BLM), United States District Court, Southern District of California, Honorable William Q. Hayes, presiding (certifying unpaid wages classes, meal period classes, wage statement class, and waiting time penalty class).

6. In 2018-2023, Thomson Reuters recognized me as a Top Young Attorney in Southern California in the annual Rising Star Edition of Super Lawyers. This is an honor awarded to no more than two-and-a-half percent (2.5%) of attorneys under the age of forty in Southern California each year.

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7. As counsel for Plaintiff, I am intimately involved with this litigation and am familiar with all aspects of this litigation. The details of the work completed in this case by me and the other attorneys in my firm are set forth in the declaration of Paul K. Haines filed concurrently herewith.

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


Sean M. Blakely