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

RICARDO F. FLORES, individually, and on
behalf of all others similarly situated,

Plaintiff,
vs.

PASADENA HOSPITAL ASSOCIATION,
LTD., a California corporation; and DOES 1
through 10, inclusive,

Defendants

SANDRA YVETTE LAGUNAS,
STEPHANIE ESTELA CERTEZA,
individually and on behalf of all others
similarly situated,

Plaintiff(s),

v.

PASADENA HOSPITAL ASSOCIATION,
LTD; a California nonprofit corporation and
DOES 1 through 100,

Defendants.

Flores Case No.: 23STCV27387
Lagunas Case No.: 23AHCV02007

[Assigned for all purposes to The Honorable Hon.
Elihu M. Berle, Dept. 6]

**DECLARATION OF ERIC BISHOP FOR
RUST CONSULTING, INC., IN SUPPORT OF
PLAINTIFF'S MOTION FOR PRELIMINARY
APPROVAL**

PRELIMINARY APPROVAL HEARING

Date: December 3, 2025

Time: 9:00am

Dept.: 6

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Attorneys for Plaintiffs Lagunas and Certeza

DECLARATION OF ERIC BISHOP FOR RUST CONSULTING, INC., IN SUPPORT OF
PLAINTIFF’S MOTION FOR PRELIMINARY APPROVAL

I, Eric Bishop, declare as follows:

1. I am a Senior Vice President for Rust Consulting, Inc. (“Rust”). My business address is 920 2nd Ave S, Suite 400, Minneapolis, MN 55402. My telephone number is (612) 968-1752. I am over twenty-one years of age and am authorized to make this declaration on behalf of Rust and myself. I have firsthand knowledge of the facts set forth in this declaration and, if called to do so, could testify competently to them.

2. Rust has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities fraud, property damage, employment discrimination, employment wage and hour, product liability, insurance and consumer issues. We have provided notification and/or claims administration services in more than 8,000 projects. Of these, approximately 4,000 were Labor & Employment cases.

3. Rust’s internal data security practices meet or exceed today’s exacting industry standards. Our enterprise-class data security measures are founded on standard business processes including a vigorous employee screening program, ongoing employee security training and a hardened production data center hosted at a Tier 1 network carrier, all designed for ensuring data integrity and security.

4. Rust is being engaged by Counsel to provide settlement administration services in the case *Lagunas v. Pasadena Hospital Association* (“Settlement”). Duties will include: a) preparing, printing, and mailing of the Notice of Class Action Settlement (“Class Notice”); b) tracking of requests for exclusion; c) drafting, mailing, and tax reporting for Settlement Award checks to Class Members; and for such other tasks as the Parties mutually agree or the Court orders Rust to perform.

5. Rust will establish a mailing address to receive requests for exclusion, undeliverable Class Notices, and other communications from Class Members.

6. Rust will set up a phone number and will staff with live Customer Service Representatives to be available for Class Members to call with questions regarding the

1 Settlement and to provide address updates. Spanish speaking agents will be available.

2 7. Rust expects to receive text for the Class Notice from Counsel shortly after
3 preliminary approval of the Settlement is granted.

4 8. Rust expects that Counsel for Defendant will provide Rust with a mailing list (
5 “Class List”) containing the Class Members’ names, last known addresses, Social Security
6 Numbers, and any other pertinent information necessary to carry out Rust’s duties.

7 9. Rust will mail the Class Notice prepared by the parties and approved by the
8 Court.

9 10. The mailing addresses contained in the Class List will be processed and updated
10 utilizing the National Change of Address Database (“NCOA”) maintained by the U.S. Postal
11 Service. The NCOA contains requested changes of address filed with the U.S. Postal Service.
12 In the event that any individual has filed a U.S. Postal Service change of address request, the
13 address listed with the NCOA will be utilized in connection with the mailing of the Class Notice.

14 11. For any Class Notices that are returned to Rust as undeliverable, Rust will
15 perform address traces in an attempt to find an updated address. The address trace will utilize
16 the Class Member’s name, previous address and Social Security Number. In the event an
17 updated address is obtained, the Class Notice documents will be promptly re-mailed to those
18 Class Members via First Class mail. For Class Notice documents that are returned by the Post
19 Office with forwarding addresses attached, these Class Notice documents will be promptly re-
20 mailed to those Class Members at the forwarding address via First Class mail.

21 12. Rust will be responsible for receiving and validating all requests for exclusions
22 and objections to the Settlement.

23 13. Rust will be responsible for calculating award amounts and tax withholdings,
24 printing and mailing payments including tax documents, establishing a Qualified Settlement
25 Fund (“QSF”), setting up a bank account, and preparing annual tax filings on behalf of the QSF.
26 Rust will establish and set up a QSF in this case based upon applicable laws and requirements.

27 14. Rust will be the fiduciary of the QSF and responsible for all payments and tax
28 reporting from the QSF. The QSF will obtain its own tax ID and report taxes under that tax ID.

15. Rust will provide Project Management and Technical Consulting staff to manage all aspects of the administration and be available to Counsel.

16. Rust will post final judgment and the new date of the Final Approval Hearing, if continued by the Court, on its website, www.rustconsulting.com.

17. The total cost for the administration of this Settlement is \$27,000 unless the actual class size (approx. 5,737) provided by counsel is materially different as that is the basis on which much of the estimate is provided. The costs are comprised of the combination of the transactional costs for print, postage, banking activities, etc., as well as the hourly fees to carry out the administrative duties.

18. None of the parties or attorneys in this matter have a relationship (financial or otherwise) with Rust.

I declare under penalty of perjury under the laws of the State of California and the United States that the above is true and correct to the best of my knowledge and that this Declaration was executed this 20th day of October 2025, at Minneapolis, MN.


Eric Bishop