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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN**

DJUANA SHANELLA HALE and
SHANNON GILBERT, individually, and on
behalf of other similarly situated employees
and aggrieved employees pursuant to the
California Private Attorneys General Act, and
GEORGE HERNANDEZ, individually, on
behalf of other similarly situated employees,

Plaintiffs,

vs.

WELBE HEALTH, LLC, a Delaware Limited
Liability Company; WELBE HEALTH PACE,
LLC, a Delaware Limited Liability Company;
WELBE HEALTH BAY AREA PACE, LLC,
a Delaware Limited Liability Company;
WELBEHEALTH INLAND EMPIRE PACE,
LLC, a Delaware Limited Liability Company;
WELBE HEALTH SAN BERNARDINO
PACE, LLC, Delaware Limited Liability
Company; LA COAST PACE, LLC, a
Delaware Limited Liability Company; WELBE
HOUSECALLS, LLC, a Delaware Limited
Liability Company; SEQUOIA PACE, LLC, a
Delaware Limited Liability Company; WELBE
HEALTH HC NOCAL, LLC, Delaware
Limited Liability Company; WELBE
HEALTH HC SOCAL, LLC, Delaware
Limited Liability Company; STOCKTON
PACE, LLC, a Delaware Limited Liability
Company; and DOES 1 through 25, inclusive,

Case No. STK-CV-UOE-2023-0006866

Honorable Robert T. Waters
Department 11B

**SUPPLEMENTAL DECLARATION OF
NATHALIE HERNANDEZ OF ILYM
GROUP, INC., REGARDING NOTICE
AND SETTLEMENT ADMINISTRATION**

Date: May 22, 2025
Time: 9:00 a.m.
Dept.: 11B

Complaint Filed: July 5, 2023
FAC Filed: September 23, 2024
Trial Date: Not Set

1 Defendants.

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8 I, Nathalie Hernandez, declare as follows:

9 1. I am a resident of the United States of America and am over the age of 18. I am a
10 Case Manager for ILYM Group, Inc., (herein after referred to as “ILYM Group”), the professional
11 settlement services provider who has been retained by the Parties’ counsel and subsequently
12 appointed by the Court to serve as the Settlement Administrator for the above captioned *Hale, et al*
13 *v. Welbe Health, LLC et al.* matter. I am authorized to make this declaration on behalf of ILYM
14 Group and myself. I have personal knowledge of the facts herein, and, if called upon to testify, I
15 could and would testify competently to such facts.

16 2. The Response Deadline for Requests for Exclusion, Notices of Objection, and
17 Workweeks Disputes was May 1, 2025. The extended Response Deadline for Requests for
18 Exclusion, Notices of Objection, and Workweeks Disputes is May 16, 2025.

19 3. As of my previous declaration filed on May 1, 2025, there have been two (2)
20 Requests for Exclusion by David Arroyo and Lexus Ortiz, two (2) Workweeks Disputes, and zero
21 (o) Notices of Objection. The two (2) Workweeks Disputes were resolved and the Class Members’
22 number of Workweeks were updated.

23 4. Accordingly, with the two (2) Requests for Exclusion and two (2) Workweeks
24 Disputes, ILYM Group reports 1,673 Settlement Class Members representing 99% of the Class
25 who worked 91,227 Workweeks and 1,363 PAGA Members who worked 42,141 PAGA
26 Workweeks.

27 5. The estimated average gross Individual Settlement Share is \$2,311.70 with the
28 estimated highest gross Individual Settlement Share being \$10,908.28, and the estimated lowest

1 gross Individual Settlement Share being \$42.44. The estimated average Individual PAGA Payment
2 is \$59.70, with the estimated highest Individual PAGA Payment being \$158.99, and the estimated
3 lowest Individual PAGA Payment being \$2.37.

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5 I declare under penalty of perjury under the laws of the State of California and the United States
6 that the foregoing is true and correct to the best of my knowledge and that this Declaration was
7 executed this 16th day of May 2025, at Tustin, California.

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NATHALIE HERNANDEZ