

Miriam L. Schimmel (State Bar No. 185089)
mschimmel@blackstonepc.com
Joana Fang (State Bar No. 309623)
jfang@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
Jared C. Osborne (State Bar No. 335968)
josborne@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Telephone: (310) 622-4278 / Facsimile: (855) 786-6356

Attorneys for Plaintiffs

**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, and
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, a 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, a Delaware Limited Liability

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

Honorable Robert T. Waters
Department 11B

PROOF OF SERVICE

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

1 Company; WELBE HEALTH HC SOCAL,
2 LLC, a Delaware Limited Liability Company;
3 STOCKTON PACE, LLC, a Delaware
4 Limited Liability Company; and DOES 1
5 through 25, inclusive,

Defendants.

1 **PROOF OF SERVICE**

2 I, Stephany Sinaguinan, certify and declare as follows:

3 I am over eighteen years of age and not a party to the within action; my business address is
4 8383 Wilshire Blvd, Suite 745, Beverly Hills, California 90211. On April 29, 2025, I served a copy
of the following document:

- 5 • **NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS**
6 **ACTION AND PAGA SETTLEMENT, ATTORNEYS' FEES AND COSTS,**
7 **ENHANCEMENT AWARDS, AND SETTLEMENT ADMINISTRATION**
8 **COSTS; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT**
9 **THEREOF**
10 • **DECLARATION OF ALEXANDRA ROSE IN SUPPORT OF PLAINTIFFS'**
11 **MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA**
12 **SETTLEMENT, ATTORNEYS' FEES AND COSTS, ENHANCEMENT**
13 **AWARDS, AND SETTLEMENT ADMINISTRATION COSTS**
14 • **DECLARATION OF PLAINTIFF DJUANA SHANELLA HALE IN SUPPORT**
15 **OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA**
16 **SETTLEMENT, ATTORNEYS' FEES AND COSTS, ENHANCEMENT**
17 **AWARDS, AND SETTLEMENT ADMINISTRATION COSTS**
18 • **DECLARATION OF PLAINTIFF SHANNON GILBERT IN SUPPORT**
19 **OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA**
20 **SETTLEMENT, ATTORNEYS' FEES AND COSTS, ENHANCEMENT**
21 **AWARDS, AND SETTLEMENT ADMINISTRATION COSTS**
22 • **DECLARATION OF PLAINTIFF GEORGE HERNANDEZ IN SUPPORT**
23 **OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA**
24 **SETTLEMENT, ATTORNEYS' FEES AND COSTS, ENHANCEMENT**
25 **AWARDS, AND SETTLEMENT ADMINISTRATION COSTS**
26 • **DECLARATION OF NATHALIE HERNANDEZ OF ILYM GROUP, INC.,**
27 **REGARDING NOTICE AND SETTLEMENT ADMINISTRATION**
28 • **[PROPOSED] FINAL APPROVAL ORDER AND JUDGMENT**

on the interested parties as follows:

Veronica T. Hunter
Samuel J. Maselli
Jackson Lewis P.C.
400 Capitol Mall, Suite 1600
Sacramento, California 95814
Tel: (916) 341-0404 / Fax: (919) 341-0141
E-mails: veronica.hunter@jacksonlewis.com
samuel.maselli@jacksonlewis.com;
gail@baum@jacksonlewis.com

Attorneys for Defendants

25 ☒ **BY ELECTRONIC MAIL (E-MAIL):** I caused said documents to be delivered electronically
26 to the above referenced addresses via email from email address *ssina@blackstonepc.com*
27 pursuant to California Code of Civil Procedure section 1010.6(e)(1). I did not receive any
28 electronic message or other indication that the transmission was unsuccessful.

///

///

1 State of California, Labor & Workforce Development Agency

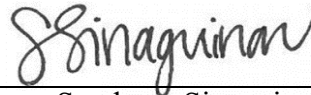
Web URL:

2 <http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

3 ☒ **BY ONLINE SUBMISSION:** The foregoing documents were transmitted to the California
4 Labor and Workforce Development Agency through the online system established for the
5 submission of notices and documents, in conformity with California Labor Code section
2699(1). I did not receive any electronic message or other indication that the transmission was
unsuccessful.

6 ☒ **STATE** – I declare under penalty of perjury under the laws of the State of California that the
above is true and correct.

7 Executed on April 29, 2025 at Beverly Hills, California.
8

9 

10 Stephany Sinaguinan
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28