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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

VICTORIA LAGROW, FABIAN
BOLANOS, ALITIA MONTIEL,
KENYATA HENDERSON, and JENNY
CHUNG, individually, on behalf of all
others similarly situated, and on behalf of
the State of California and other aggrieved
persons; and CARLOS DELGADO,
individually, and on behalf of all others
similarly situated,

Plaintiffs,

v.

STRIVE WELL-BEING INC., a California
corporation; and DOES 1 through 10,
inclusive,

Defendant.

Case No.: 23STCV20762

*[Assigned for all purposes to the Hon. Samantha
Jessner, Dept. 7]*

**DECLARATION OF MISSY CAREY IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Information:

Date: August 12, 2026

Time: 11:00 a.m.

Dept.: 7

Action Filed: August 29, 2023

FAC Filed: May 14, 2024

SAC Filed: October 24, 2025

DECLARATION OF MISSY CAREY

1. I am the Case Manager for the proposed settlement administrator Apex Class Action LLC (“Apex”), a class action settlement administration company headquartered in Irvine, California. I have personal knowledge of the facts outlined in this declaration and, if called as a witness, I could and would competently testify thereto.

2. Apex’s team has been directly involved with class action administration for a combined 150 years and has successfully managed numerous class action cases during that time. Our team comprises experienced professionals with extensive knowledge of class action settlement administration. In addition, Apex has the necessary technology and infrastructure to efficiently manage large-scale class action cases. We utilize state-of-the-art software and systems to ensure that all aspects of the administration process are executed accurately and efficiently.

3. Pursuant to the Court’s direction, the Parties’ counsel requested that Apex determine whether the escalator clause of the settlement agreement was triggered.

4. On July 10, 2026, counsel for Strive Well-Being Inc (“Defendant”), provided Apex with the “Class List.” The Class List contained the following information for each Class Member: name, social security number, phone number, email address, last known mailing address, hire date, end date, and total class workweeks allocated. Apex confirmed with counsel for the Defendant that the workweek counts provided reflected any leaves of absence, furloughs, time-offs, etc that was taken by the employees. It was additionally confirmed that by definition, even if one day was worked during any workweek (as reflected by pay records), it was counted as a workweek based on the dates they worked for Defendant during the Class Period.

5. Apex uploaded the Class List to our database and conducted a thorough review for duplicates and potential inconsistencies. The Class List is comprised of 501 individuals who worked a total of 30,333 Workweeks, which did not exceed the escalator clause threshold of 32,982 Workweeks.

6. I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct, and that this Declaration was executed this 16th day of July 2026, in Irvine, California.


Missy Carey