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Attorneys for Plaintiffs ARACELI HERRERA,
LORETTA URBINA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

ARACELI HERRERA, individually, and on
behalf of other members other members of the
general public similarly situated; BRITTANY
TOWNS, LORETTA URBINA, individually,
and on behalf of other members other
members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiffs,

vs.

BEHAVIORAL SYSTEMS SOUTHWEST,
INC., a California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No. 30-2022-01243365-CU-OE-CXC

Honorable David A. Hoffer
Department CX-103

CLASS ACTION

**DECLARATION OF ARACELI
HERRERA IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT AND
PROVISIONAL CERTIFICATION OF
CLASS**

Reservation: 74586782

Complaint Filed: January 28, 2022
FAC Filed: December 13, 2024
Trial Date: None Set

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5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement agreement and asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me an enhancement award in the amount of \$12,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement award as well as my share of the settlement as a class member and as an aggrieved employee.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 06/11/25 day of June 2025, at Corona, California

Electronically Signed: 2025-06-11 17:46:22 UTC - 172.56.181.
Nintex AssureSign® 787d7ca1-9272-4b19-9688-b2f9010e-619

Araceli Herrera