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Attorneys for Plaintiff Geovanni Vazquez

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

GEOVANNI VAZQUEZ, individually, and
on behalf of other members of the general
public similarly situated;

Plaintiff,

vs.

CALCARE, INC., a California corporation;
CARPINTERICA LLC, a California limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: S-CV-0049068

Honorable Michael Jones
Department 3

CLASS ACTION

**[PROPOSED] ORDER GRANTING
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: September 11, 2025
Time: 8:30 a.m.
Department: 3

Complaint Filed: September 7, 2022
Trial Date: None Set

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 450 North Brand Blvd., Suite 900, Glendale, California 91203.

On August 19, 2025, I served the foregoing document(s) described as:

- **PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT; MEMORANDUM OF POINTS AND AUTHORITIES**
- **DECLARATION OF BRIAN J. ST. JOHN IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF HALI M. ANDERSON IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT**
- **DECLARATION OF GEOVANNI VAZQUEZ IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF PLAINTIFF DOROTHEA BOWENS IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT**
- **[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **PROOF OF SERVICE**

on interested parties in this action by U.S. Mail and Electronic Service as follows:

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1 Kalesta Healthcare Group, LLC in the Bowens matter

2 Counsel for Defendants Carpinterica, LLC in the Vazquez matter

3 Counsel for Defendants Carpinteria, LLC dba Atheron Park Post-Acute and Kalesta Healthcare
4 Group, LLC in the Aguilar matter

5 W. Steven Shumway, Esq. (sshumway@shumwaylaw.com)
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7 3300 Douglas Blvd., Suite 250
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8 *Attorney for Defendant Calcare, Inc. in the Vazquez matter*

9 **[X] BY U.S. MAIL**

10 As follows: I am “readily familiar” with the firm’s practice of collection and processing
11 correspondence for mailing. Under that practice, it would be deposited with U.S. Postal
12 Service on that day with postage thereon fully prepaid at Glendale, California in the
13 ordinary course of business. I am aware that on motion of the party served, service is
presumed invalid if postal cancellation date or postage meter date is more than one day
after date of deposit for mailing an affidavit.

14 **[X] BY E-MAIL**

15 The above-referenced document(s) was transmitted to the person(s) at the e-mail
16 address(es) listed herein at their most recent known e-mail address or e-mail of record in
this action. I did not receive, within reasonable time after the transmission, any electronic
message or other indication that the transmission was unsuccessful.

17 State of California, Labor & Workforce Development Agency Web URL:
18 <http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

19 **[X] BY ONLINE SUBMISSION**

20 The foregoing documents were transmitted to the California Labor and Workforce
21 Development Agency through the online system established for the submission of notices
22 and documents, in conformity with California Labor Code section 2699(l). I did not
receive, within a reasonable time after the transmission, any electronic message or other
indication that the transmission was unsuccessful.

23 **[X] STATE**

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

25 Executed on August 19, 2025, at Glendale, California.

26 

27 Deven Launchbaugh
28