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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA**

DIANA RODRIGUEZ, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

v.

VISITING NURSE & HOSPICE CARE, an
unknown business entity; VISITING NURSE
& HOSPICE CARE OF SANTA BARBARA,
a California corporation; VNA HEALTH, an
unknown business entity; PERSONAL CARE
SERVICES, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 22CV05104

Honorable Donna Geck
Department 4

CLASS ACTION

PROOF OF SERVICE

Complaint Filed: December 21, 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 September 11, 2025, I served the foregoing document(s) described as:

- **PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND PAGA SETTLEMENT; MEMORANDUM OF POINTS AND AUTHORITIES**
- **[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF TARA ZABEHI IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF DIANA RODRIGUEZ IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

on interested parties in this action as follows:

Paul K. Wilcox
Rafael Gonzalez
Christina M. Behrman
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112 East Victoria Street
Post Office Drawer 789
Santa Barbara, CA 93102-0789

Email Service: pwilcox@mullenlaw.com; rgonzalez@mullenlaw.com;
cbehrman@mullenlaw.com; lsire@mullenlaw.com

Attorneys for Defendants

[X] BY E-MAIL

The above-referenced document was transmitted to the person(s) at the e-mail addresses 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.

State of California Labor & Workforce Development Agency
Web URL:

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

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1 **[X] BY ONLINE SUBMISSION**

2 The foregoing documents were transmitted to the California Labor and Workforce
3 Development Agency through the online system established for the submission of
4 notices 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.

5 **[X] STATE**

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

7 Executed on September 11, 2025, at Glendale, California.

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11 Timothy Betancourt
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