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Case Number CVRI2306412 0000129180571 - Jason B. Galkin, Executive Officer/Clerk of the Court By Joanne Bishop, Clerk

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

RACHEL SANGER, individually, and on behalf of all others similarly situated, *Plaintiff,* v. SOUTHERN CALIFORNIA VETERINARY CENTER, INC. DBA SOUTHERN CALIFORNIA VETERINARY CENTER, a California corporation; and DOES 1 through 10, inclusive, *Defendants.*	Case No.: CVRI2306412 (Lead) Case No.: CVRI2400368 *Assigned for all purposes to:* *Harold W. Hopp* *Dept. 1* **SUPPLEMENTAL DECLARATION OF LISA B. ITURRIAGA IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Date: May 13, 2025 Time: 8:30 a.m. Dept.: 1

WILSHIRE LAW FIRM, PLC
3055 Wilshire Blvd, 12th Floor
Los Angeles, CA 90010-1137

I, Lisa B. Iturriaga, hereby declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a settlement attorney at Wilshire Law Firm, PLC ("WLF"), counsel for Plaintiff Rachel Sanger ("Plaintiff") in this matter. I am thoroughly familiar with and have personal knowledge of all of the facts set forth herein.

2. I submit this supplemental declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement ("Motion").

3. On May 13, 2025, the Court issued the following tentative stating: (a) confirm that all aggrieved employees will receive a pro rata share of the PAGA penalties regardless of whether they opt out of the class settlement and revise opt out form to make this clear; (b) no declaration from defendant concerning likely age, education, experience, and ability to read English; and (c) class period in the notice starts on 11/29/19 but agreement says 6/4/19. Notice says administrator is ILYM but agreement says Phoenix.

4. On May 14, 2025, counsel for Plaintiff and counsel for Defendant appeared at the Preliminary Approval hearing. At the hearing, Judge Hopp advised he was granting the Motion but required a revised Proposed Order to be submitted that advised the class administrator Phoenix would send out Class Notice in English and Spanish in addition to the revisions addressed in the Court's tentative.

5. At the Preliminary Approval hearing, counsel for Plaintiff confirmed that the Settlement Agreement and Class Notice both make it clear that "all aggrieved employees will receive a pro rata share of the PAGA penalties regardless of whether they opt out of the class settlement". Counsel for Defendant addressed the Court's tentative regarding "no declaration from defendant…" and advised that out of precaution the Class Notice was being sent in English and Spanish to the Class as reflected in the Settlement Agreement (which was attached to Yslas declaration filed on April 21, 2025) and Phoenix's bid (which was attached to Phoenix's declaration filed on April 21, 2025).

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Los Angeles, CA 90010-1137

6. Based on the Court's tentative ruling, counsel for Plaintiff revised the Exclusion Request Form adding that "**Aggrieved Employees will receive a pro-rata share of the PAGA portion of the settlement, regardless of whether they opt out of the Class Settlement**." Additionally, Counsel for Plaintiff changed reference of "settlement payment" or "Individual Settlement Payment" to "**Individual Class Payment**" so that it reflected the language of the Settlement Agreement. A true and correct copy of the redlined Request for Exclusion form is attached hereto as **Exhibit A**. A true and correct copy of the revised Request for Exclusion form is attached hereto as **Exhibit B**.

7. Based on the Court's tentative ruling, counsel for Plaintiff revised the proposed Class Notice on page 1, correcting the Class Period from "November 29, 2019 to October 18, 2024" to "**June 4, 2019** to October 18, 2024". Counsel for Plaintiff further revised the proposed Class Notice on page 6, paragraph 3, subsection 7, correcting the Administrator from "ILYM Group, Inc." to "**Phoenix Class Action Administration Solutions**" per the Court's tentative ruling. A true and correct copy of the redlined proposed Class Notice is attached hereto as **Exhibit C**. A true and correct copy of the revised proposed Class Notice is attached hereto as **Exhibit D**.

8. Based on Judge Hopp's comments at the Preliminary Approval hearing, counsel for Plaintiff revised the Proposed Order in paragraph 10 to include that "on a preliminary basis that plan for distribution of the Notice **in English and Spanish** to Settlement Class members satisfies due process…". Counsel for Plaintiff further revised the Proposed Order caption to include the word "**REVISED**" to assist the Court with differentiating the previous Proposed Order filed on April 21, 2025, and revised Proposed Order attached herein. Counsel for Plaintiff further revised the Proposed Order by removing the set dates in paragraph 15's "Implementation Schedule" to avoid having incorrect deadline dates and clarifying that the Final Approval Hearing date is September 23, 2025 as confirmed by Judge Hopp at the Preliminary Approval hearing on May 13,

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Los Angeles, CA 90010-1137

2025. A true and correct copy of the redlined Revised [Proposed] Order is attached hereto as **Exhibit E**. A true and correct copy of the Revised [Proposed] Order is attached hereto as **Exhibit F**.

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

Executed on May 14, 2025 at Los Angeles, California.

/s/ Lisa B. Iturriaga
Lisa B. Iturriaga

WILSHIRE LAW FIRM, PLC
3055 Wilshire Blvd, 12th Floor
Los Angeles, CA 90010-1137

EXHIBIT A

EXHIBIT A

Rachel Sanger v. Southern California Veterinary Center, Inc. dba Southern California Veterinary Center
Riverside County Superior Court Case Nos. CVRI2306412 (Lead) & CVRI2400368

||||||||||||||||||||||||||||||||
<<PSA ID>>
<<First Last>>
<<Address>>
<<City, State, Zip, Country>>

Name/Address Changes (if any):

_____
_____
_____

EXCLUSION REQUEST FORM

Use and return this form only if you wish to be excluded from the Class and do not wish to receive an Individual Class ~~settlement~~ ~~p~~Payment. If you exclude yourself from the Class by signing and returning this form, you will not receive your Individual ~~Settlement~~ Class Payment, you will not be subject to the terms of the Class Settlement, and you will retain whatever rights you may currently have. Aggrieved Employees will receive a pro-rata share of the PAGA portion of the settlement, regardless of whether they opt out of the Class Settlement.

If you wish to remain in the Class and receive a settlement payment, you may disregard this form. You do not need to do anything, and you will receive a check by U.S. Mail.

To be valid, your Exclusion Request Form must (a) include your full name, address, and last four digits of your Social Security number, (b) be signed by you, and (c) be returned to the Settlement Administrator via fax, e-mail, or U.S. Mail on or before _____, 2025.

I HEREBY CONFIRM THAT I HAVE RECEIVED NOTICE OF THE PROPOSED SETTLEMENT IN THE *SANGER V. SOUTHERN CALIFORNIA VETERINARY CENTER, INC.* ACTION AND I WISH TO EXCLUDE MYSELF FROM THE SETTLEMENT REACHED IN THE MATTER OF *SANGER V. SOUTHERN CALIFORNIA VERTERINARY CENTER, INC.* I UNDERSTAND THAT BY EXCLUDING MYSELF, I WILL NOT RECEIVE ANY MONEY FROM THE CLASS SETTLEMENT REACHED IN THIS MATTER BUT MAY STILL BE ELIGIBLE FOR PAYMENT UNDER THE PORTION OF THE SETTLEMENT ALLOCATED UNDER PAGA.

Dated: _____ **Signature:** _____

Last Four Digits of SSN: _____ **Printed Name:** _____

What is the Settlement Administrator's address?

Sanger v. Southern California Veterinary Center, Inc.
c/o Phoenix Settlement Administrators
P.O. Box 7208
Orange, CA 92863
T: (800) 523-5773
F: _____

E-mail: _____

EXHIBIT B

EXHIBIT B

|||||||||||||||||||||||||||||||||
<<PSA ID>>
<<First Last>>
<<Address>>
<<City, State, Zip, Country>>

Name/Address Changes (if any):

_____
_____
_____

EXCLUSION REQUEST FORM

Use and return this form only if you wish to be excluded from the Class and do not wish to receive an Individual Class Payment. If you exclude yourself from the Class by signing and returning this form, you will not receive your Individual Class Payment, you will not be subject to the terms of the Class Settlement, and you will retain whatever rights you may currently have. Aggrieved Employees will receive a pro-rata share of the PAGA portion of the settlement, regardless of whether they opt out of the Class Settlement.

If you wish to remain in the Class and receive a settlement payment, you may disregard this form. You do not need to do anything, and you will receive a check by U.S. Mail.

To be valid, your Exclusion Request Form must (a) include your full name, address, and last four digits of your Social Security number, (b) be signed by you, and (c) be returned to the Settlement Administrator via fax, e-mail, or U.S. Mail on or before _____, 2025.

I HEREBY CONFIRM THAT I HAVE RECEIVED NOTICE OF THE PROPOSED SETTLEMENT IN THE *SANGER V. SOUTHERN CALIFORNIA VETERINARY CENTER, INC.* ACTION AND I WISH TO EXCLUDE MYSELF FROM THE SETTLEMENT REACHED IN THE MATTER OF *SANGER V. SOUTHERN CALIFORNIA VERTERINARY CENTER, INC.* I UNDERSTAND THAT BY EXCLUDING MYSELF, I WILL NOT RECEIVE ANY MONEY FROM THE CLASS SETTLEMENT REACHED IN THIS MATTER BUT MAY STILL BE ELIGIBLE FOR PAYMENT UNDER THE PORTION OF THE SETTLEMENT ALLOCATED UNDER PAGA.

Dated: _____ **Signature:** _____

Last Four Digits of SSN: _____ **Printed Name:** _____

What is the Settlement Administrator's address?

Sanger v. Southern California Veterinary Center, Inc.
c/o Phoenix Settlement Administrators
P.O. Box 7208
Orange, CA 92863
T: (800) 523-5773
F: _____

E-mail: _____

EXHIBIT C

EXHIBIT C

COURT APPRO ED NOTICE OF CLASS ACTION AND PA A SETTLEMENT AND HEARIN DATE FOR FINAL COURT APPRO AL

Rachel Sanger v. Southern California Veterinary Center, Inc.

r d r r r

The Superior Court for the State of California authorized this Notice. Read it carefully!
It's not junk mail, spam, an advertisement or solicitation by a lawyer. You are not being sued.

ou may be eligible to receive money *r*
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d d r rd d r rr **your Individual Class Payment is estimated to be _____ (less ithholding) and your Individual PA A Payment is estimated to be** *r d r d*
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r d d r rd **you or ed _____**
or ee s *d r r d d* **you or ed _____ ay eriods** *d r r d*
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r d r r r r d

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Do Nothing *d d r r d*
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r M r r r r
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O t-Out of the Class Settlement *d r r*
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Defendant ill not retaliate against you for any actions you ta e ith res ect to the ro osed Settlement.

SUMMAR OF OUR LE AL RI HTS AND OPTIONS IN THIS SETTLEMENT

ou Don't Have to Do Anything to Partici ate in the Settlement	*d r M r* *r d d d d d* *r r r* *d r r d* *d*
ou Can O t-out of the Class Settlement but not the PA A Settlement **The O t-out Deadline is _____**	*d r r d* *d d r r* *r r d d* *r M r d r r d d* *r M r* *r r d* *r r d* *d d d r d* *d r d r r* *r d d d*
Partici ating Class Members Can Ob ect to the Class Settlement but not the PA A Settlement **Written Ob ections Must be Submitted by _____**	*M r d r* *M r r d* *r d r r* *d d r d* *d r d r* *r r r r* *r d r d d r d* *r d r M r* *r d r* *r r 7*

ou Can Partici ate in the _____ Final A roval Hearing	*r r r d d d d d r r r r r r r r r r r r r r r M r r r r 8*
ou Can Challenge the Calculation of our Wor ee s Pay Periods **Written Challenges Must be Submitted by _____**	*r d d d d r r d r d d r d d r r d r d r d d r d r r d r d r d r d r d r d r rd d r rd d r d r r r*

1. WHAT IS THE ACTION ABOUT?

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2. WHAT DOES IT MEAN THAT THE ACTION HAS SETTLED?

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3. WHAT ARE THE IMPORTANT TERMS OF THE PROPOSED SETTLEMENT?

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. **HOW WILL THE ADMINISTRATOR CALCULATE M PA MENT?**

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d r rd r d r rd r r
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5. **HOW WILL I ET PAID?**

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r r M r

our chec ill be sent to the same address as this Notice. If you change your address, be sure to notify the Administrator as soon as ossible. Section of this Notice has the Administrator's contact information.

. HOW DO I OPT-OUT OF THE CLASS SETTLEMENT?

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d r r r d d r r r
r d d d r d r
ddr r r d d r r r
r r r r r r
d **The Administrator must be sent your request to be excluded by _____, or it ill be invalid.** *d r r r*

7. HOW DO I OB ECT TO THE SETTLEMENT?

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r r **The deadline for sending ritten ob ections to the Administrator is** *r d r r*
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8. CAN I ATTEND THE FINAL APPRO AL HEARIN ?

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. HOW CAN I ET MORE INFORMATION?

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DO NOT TELEPHONE THE SUPERIOR COURT TO OBTAIN INFORMATION ABOUT THE SETTLEMENT.

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10. WHAT IF I LOSE M SETTLEMENT CHEC ?

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11. WHAT IF I CHAN E M ADDRESS?

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EXHIBIT D

EXHIBIT D

COURT APPROVED NOTICE OF CLASS ACTION AND PAGA SETTLEMENT AND HEARING DATE FOR FINAL COURT APPROVAL

Rachel Sanger v. Southern California Veterinary Center, Inc.

r d r r r

The Superior Court for the State of California authorized this Notice. Read it carefully! It's not junk mail, spam, an advertisement or solicitation by a lawyer. You are not being sued.

You may be eligible to receive money *r*
r r r r r d d r d r
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r d d rr r r d
r M r r d r d d r r d
r d d r r r r r
r r d r r d r d d r
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d d r rd d r rr **your Individual Class Payment is estimated to be $________ (less withholding) and your Individual PAGA Payment is estimated to be $** *r d r d*
d d r r d r r d d
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r d d r rd **you worked ______ workweeks** *d r r d d* **you worked _____ pay periods** *d r r d*
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Do Nothing *d d r r d*
d r d d d r d d
r M r r r r
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Opt-Out of the Class Settlement *d r r*
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d r r r r
d d r r r r r r r
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r r d

Defendant will not retaliate against you for any actions you take with respect to the proposed Settlement.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

You Don't Have to Do Anything to Participate in the Settlement	*d r M r* *r d d d d d* *r r r* *d r r d* *d*
You Can Opt-out of the Class Settlement but not the PAGA Settlement **The Opt-out Deadline is _____**	*d r r d* *d d r r* *r r d d* *r M r d r r d d* *r M r* *r r d* **6** *r r d* *d d d r d* *d r d r r* *r d d d*
Participating Class Members Can Object to the Class Settlement but not the PAGA Settlement **Written Objections Must be Submitted by** **_____**	*M r d r* *M r r d* *r d r r* *d d r d* *d r d r* *r r r r* *r d r d d r d* *r d r M r* *r d r* *r r* **7**

You Can Participate in the ____________ Final Approval Hearing	**8**
You Can Challenge the Calculation of Your Workweeks/Pay Periods **Written Challenges Must be Submitted by ____________**	**4**

1. WHAT IS THE ACTION ABOUT?

et seq

2. WHAT DOES IT MEAN THAT THE ACTION HAS SETTLED?

3. WHAT ARE THE IMPORTANT TERMS OF THE PROPOSED SETTLEMENT?

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Your check will be sent to the same address as this Notice. If you change your address, be sure to notify the Administrator as soon as possible. Section 9 of this Notice has the Administrator's contact information.

6. HOW DO I OPT-OUT OF THE CLASS SETTLEMENT?

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d **The Administrator must be sent your request to be excluded by _____, or it will be invalid.** *d r r r*

7. HOW DO I OBJECT TO THE SETTLEMENT?

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8. CAN I ATTEND THE FINAL APPROVAL HEARING?

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DO NOT TELEPHONE THE SUPERIOR COURT TO OBTAIN INFORMATION ABOUT THE SETTLEMENT.

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10. WHAT IF I LOSE MY SETTLEMENT CHECK?

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EXHIBIT F

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to Exhibit F

COURT APPROVED NOTICE OF CLASS ACTION AND PAGA SETTLEMENT AND HEARING DATE FOR FINAL COURT APPROVAL

Rachel Sanger v. Southern California Veterinary Center, Inc.,
Riverside County Superior Court, Case No. CVRI2306412

The Superior Court for the State of California authorized this Notice. Read it carefully! It's not junk mail, spam, an advertisement or solicitation by a lawyer. You are not being sued.

You may be eligible to receive money from an employee class action lawsuit ("Action") against Southern California Veterinary Center, Inc. ("Defendant" is used herein as a placeholder) for alleged wage and hour violations. The Action was filed by a former Defendant employee Rachel Sanger ("Plaintiff") and seeks payment of (1) back wages and other relief for a class of hourly-paid or non-exempt employees ("Class Members") who worked for Defendant during the Class Period of June 4, 2019 to October 18, 2024 and (2) penalties under the California Private Attorney General Act ("PAGA") for all hourly-paid or non-exempt employees who worked for Defendant during the PAGA Period of November 17, 2022 to October 18, 2024 ("Aggrieved Employees").

The proposed Class Action and PAGA Settlement Agreement ("Agreement") has two main parts: (1) a Class Settlement requiring Defendant to fund Individual Class Payments, and (2) a PAGA Settlement requiring Defendant to fund Individual PAGA Payments and pay penalties to the California Labor and Workforce Development Agency ("LWDA").

Based on Defendant's records, and the Parties' current assumptions, **your Individual Class Payment is estimated to be $_____ (less withholding) and your Individual PAGA Payment is estimated to be $_____**. The actual amount you may receive likely will be different and will depend on a number of factors. (If no amount is stated for your Individual PAGA Payment, then according to Defendant's records you are not eligible for an Individual PAGA Payment under the Settlement because you didn't work during the PAGA Period.)

The above estimates are based on Defendant's records showing that **you worked _____ workweeks** during the Class Period and **you worked _____ pay periods** during the PAGA Period. If you believe that you worked more workweeks or pay periods during either period, you can submit a challenge by the deadline date. See Section 4 of this Notice.

The Court has already preliminarily approved the proposed Settlement and approved this Notice. The Court has determined only that there is sufficient evidence to suggest that the proposed settlement might be fair, adequate, and reasonable. The Court has not yet decided whether to grant final approval and any final determination of those issues will be made at the final hearing. Your legal rights are affected whether you act or not act. Read this Notice carefully. You will be deemed to have carefully read and understood it. At the Final Approval Hearing, the Court will decide whether to finally approve the Settlement and how much of the Settlement will be paid to Plaintiff and Plaintiff's attorneys ("Class Counsel"). The Court will also decide whether to enter a judgment that requires Defendant to make payments under the Settlement and requires Class Members and Aggrieved Employees to give up their rights to assert certain claims against Defendant.

If you worked for Defendant during the Class Period and/or the PAGA Period, you have two basic options under the Settlement:

(1) **Do Nothing**. You don't have to do anything to participate in the proposed Settlement and be eligible for an Individual Class Payment and/or an Individual PAGA Payment. As a Participating Class Member, though, you will give up your right to assert Class Period wage claims and PAGA Period penalty claims against Defendant.

(2) **Opt-Out of the Class Settlement**. You can exclude yourself from the Class Settlement (opt-out) by submitting the written Request for Exclusion or otherwise notifying the Administrator in writing. If you opt-out of the Settlement, you will not receive an Individual Class Payment. You will, however, preserve your right to personally pursue Class Period wage claims against Defendant, and, if you are an Aggrieved Employee, remain eligible for an Individual PAGA Payment. You cannot opt-out of the PAGA portion of the proposed Settlement.

Defendant will not retaliate against you for any actions you take with respect to the proposed Settlement.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

You Don't Have to Do Anything to Participate in the Settlement	If you do nothing, you will be a Participating Class Member, eligible for an Individual Class Payment and an Individual PAGA Payment (if any). In exchange, you will give up your right to assert the wage claims against Defendant that are covered by this Settlement (Released Claims).
You Can Opt-out of the Class Settlement but not the PAGA Settlement **The Opt-out Deadline is _____**	If you don't want to fully participate in the proposed Settlement, you can opt-out of the Class Settlement by sending the Administrator a written Request for Exclusion. Once excluded, you will be a Non-Participating Class Member and no longer eligible for an Individual Class Payment. Non-Participating Class Members cannot object to any portion of the proposed Settlement. See Section **6** of this Notice. You cannot opt-out of the PAGA portion of the proposed Settlement. Defendant must pay Individual PAGA Payments to all Aggrieved Employees and the Aggrieved Employees must give up their rights to pursue Released Claims (defined below).
Participating Class Members Can Object to the Class Settlement but not the PAGA Settlement **Written Objections Must be Submitted by** _____	All Class Members who do not opt-out ("Participating Class Members") can object to any aspect of the proposed Settlement. The Court's decision whether to finally approve the Settlement will include a determination of how much will be paid to Class Counsel and Plaintiff who pursued the Action on behalf of the Class. You are not personally responsible for any payments to Class Counsel or Plaintiff, but every dollar paid to Class Counsel and Plaintiff reduces the overall amount paid to Participating Class Members. You can object to the amounts requested by Class Counsel or Plaintiff if you think they are unreasonable. See Section **7** of this Notice.

You Can Participate in the _____ Final Approval Hearing	The Court's Final Approval Hearing is scheduled to take place on _____. You don't have to attend but you do have the right to appear (or hire an attorney to appear on your behalf at your own cost), in person, by telephone or by using the Court's virtual appearance platform. Participating Class Members can verbally object to the Settlement at the Final Approval Hearing. See Section **8** of this Notice.
You Can Challenge the Calculation of Your Workweeks/Pay Periods **Written Challenges Must be Submitted by _____**	The amount of your Individual Class Payment and PAGA Payment (if any) depend on how many workweeks you worked at least one day during the Class Period and how many Pay Periods you worked at least one day during the PAGA Period, respectively. The number Class Period Workweeks and number of PAGA Period Pay Periods you worked according to Defendant's records is stated on the first page of this Notice. If you disagree with either of these numbers, you must challenge it by _____. See Section **4** of this Notice.

1. WHAT IS THE ACTION ABOUT?

Plaintiff is a former employee of Defendant. The Action accuses Defendant of violating California labor laws for failure to pay minimum and straight time wages, failure to pay overtime, failure to provide meal periods, failure to authorize and permit rest periods, failure to timely pay final wages at termination, failure to provide accurate itemized wage statements, failure to indemnify employees for expenditures, and unfair business practices. Based on the same claims, Plaintiff has also asserted a claim for civil penalties under the Labor Code Private Attorneys General Act of 2004, Labor Code sections 2698 *et seq*. ("PAGA"). Plaintiff is represented by attorneys in the Action: Wilshire Law Firm, PLC ("Class Counsel.")

Defendant strongly denies violating any laws or failing to pay any wages and contends it complied with all applicable laws.

2. WHAT DOES IT MEAN THAT THE ACTION HAS SETTLED?

So far, the Court has made no determination whether Defendant or Plaintiff is correct on the merits. In the meantime, Plaintiff and Defendant hired Mike Young, an experienced, neutral mediator, in an effort to resolve the Action by negotiating an to end the case by agreement (settle the case) rather than continuing the expensive and time-consuming process of litigation. The negotiations were successful. By signing a lengthy written settlement agreement ("Agreement") and agreeing to jointly ask the Court to enter a judgment ending the Action and enforcing the Agreement, Plaintiff and Defendant have negotiated a proposed Settlement that is subject to the Court's Final Approval. Both sides agree the proposed Settlement is a compromise of disputed claims. By agreeing to settle, Defendant does not admit any violations or concede the merit of any claims.

Plaintiff and Class Counsel strongly believe the Settlement is a good deal for you because they believe that: (1) Defendant has agreed to pay a fair, reasonable and adequate amount considering the strength of the claims and the risks and uncertainties of continued litigation; and (2) Settlement is in the best interests of the Class Members and Aggrieved Employees. The Court preliminarily approved the proposed Settlement as fair, reasonable and adequate, authorized this Notice, and scheduled a hearing to determine Final Approval.

3. WHAT ARE THE IMPORTANT TERMS OF THE PROPOSED SETTLEMENT?

1. Defendant Will Pay $120,000.00 as the Gross Settlement Amount (Gross Settlement). Defendant has agreed to deposit the Gross Settlement into an account controlled by the Administrator of the Settlement. The Administrator will use the Gross Settlement to pay the Individual Class Payments, Individual PAGA Payments, Class Representative Service Payment, Class Counsel's attorneys' fees and expenses, the Administrator's expenses, and penalties to be paid to the California Labor and Workforce Development Agency ("LWDA"). Assuming the Court grants Final Approval, Defendant will fund the Gross Settlement not more than 14 days after the Judgment entered by the Court become final. The Judgment will be final on the date the Court enters Judgment, or a later date if Participating Class Members object to the proposed Settlement or the Judgment is appealed.

2. Court Approved Deductions from Gross Settlement. At the Final Approval Hearing, Plaintiff and/or Class Counsel will ask the Court to approve the following deductions from the Gross Settlement, the amounts of which will be decided by the Court at the Final Approval Hearing:

   A. Up to $39,996.00 (33 1/3% of the Gross Settlement) to Class Counsel for attorneys' fees and up to $25,000.00 for their litigation expenses. To date, Class Counsel have worked and incurred expenses on the Action without payment.

   B. Up to $7,500.00 as a Class Representative Award for filing the Action, working with Class Counsel and representing the Class. A Class Representative Award will be the only monies Plaintiff will receive other than Plaintiff's Individual Class Payment and any Individual PAGA Payment.

   C. Up to $6,500 to the Administrator for services administering the Settlement.

   D. Up to $10,000.00 for PAGA Penalties, allocated 75% to the LWDA PAGA Payment and 25% in Individual PAGA Payments to the Aggrieved Employees based on their PAGA Period Pay Periods.

   Participating Class Members have the right to object to any of these deductions. The Court will consider all objections.

3. Net Settlement Distributed to Class Members. After making the above deductions in amounts approved by the Court, the Administrator will distribute the rest of the Gross Settlement (the "Net Settlement") by making Individual Class Payments to Participating Class Members based on their Class Period Workweeks.

4. Taxes Owed on Payments to Class Members. Plaintiff and Defendant are asking the Court to approve an allocation of 20% of each Individual Class Payment to taxable wages ("Wage Portion") and 80% to interest, penalties, etc. ("Non-Wage Portion"). The Wage Portion is subject to withholdings and will be reported on IRS W-2 Forms. Defendant will separately pay employer payroll taxes it owes on the Wage Portion. The Individual PAGA Payments are counted as penalties rather than wages for tax purposes. The Administrator will report

the Individual PAGA Payments and the Non-Wage Portions of the Individual Class Payments on IRS 1099 Forms.

Although Plaintiff and Defendant have agreed to these allocations, neither side is giving you any advice on whether your Payments are taxable or how much you might owe in taxes. You are responsible for paying all taxes (including penalties and interest on back taxes) on any Payments received from the proposed Settlement. You should consult a tax advisor if you have any questions about the tax consequences of the proposed Settlement.

Need to Promptly Cash Payment Checks. The front of every check issued for Individual Class Payments and Individual PAGA Payments will show the date when the check expires (the void date). If you don't cash it by the void date, your check will be automatically cancelled, and the monies will be deposited with the California Controller's Unclaimed Property Fund in your name. If the monies represented by your check is sent to the Controller's Unclaimed Property, you should consult the rules of the Fund for instructions on how to retrieve your money.

5. Requests for Exclusion from the Class Settlement (Opt-Outs). You will be treated as a Participating Class Member, participating fully in the Class Settlement, unless you notify the Administrator in writing, not later than _____, that you wish to opt-out. The easiest way to notify the Administrator is to send a written and signed Request for Exclusion by the _____ Response Deadline. The Request for Exclusion should be a letter from a Class Member or his/her/their representative setting forth a Class Member's name, present address, telephone number, and a simple statement electing to be excluded from the Settlement. Excluded Class Members (*i.e.*, Non-Participating Class Members) will not receive Individual Class Payments but will preserve their rights to personally pursue wage and hour claims against Defendant.

   You cannot opt-out of the PAGA portion of the Settlement. Class Members who exclude themselves from the Class Settlement (Non-Participating Class Members) remain eligible for Individual PAGA Payments and are required to give up their right to assert PAGA claims against Defendant based on the PAGA Period facts alleged in the Action.

6. The Proposed Settlement Will be Void if the Court Denies Final Approval. It is possible the Court will decline to grant Final Approval of the Settlement or decline enter a Judgment. It is also possible the Court will enter a Judgment that is reversed on appeal. Plaintiffs and Defendant have agreed that, in either case, the Settlement will be void: Defendant will not pay any money and Class Members will not release any claims against Defendant.

7. Administrator. The Court has appointed a neutral company, Phoenix Class Action Administration Solutions (the "Administrator") to send this Notice, calculate and make payments, and process Class Members' Requests for Exclusion. The Administrator will also decide Class Member Challenges over Workweeks, mail and re- mail settlement checks and tax forms, and perform other tasks necessary to administer the Settlement. The Administrator's contact information is contained in Section 9 of this Notice.

8. Participating Class Members' Release. After the Judgment is final and Defendant has fully funded the Gross Settlement and separately paid all employer payroll taxes, Participating

Class Members will be legally barred from asserting any of the claims released under the Settlement. This means that unless you opted out by validly excluding yourself from the Class Settlement, you cannot sue, continue to sue or be part of any other lawsuit against Defendant or related entities for wages based on the Class Period facts and PAGA penalties based on PAGA Period facts, as alleged in the Action and resolved by this Settlement.

The Participating Class Members will be bound by the following release:

> All Participating Class Members, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors and assigns, release Released Parties from all claims that were alleged, or reasonably could have been alleged, based on the Class Period facts stated in the Operative Complaints and ascertained in the course of the Action including alleged violations of the California Labor Code and the Industrial Welfare Commission Wage Order(s) during the Class Period for alleged: failure to provide meal periods, failure to provide rest periods, failure to pay regular and overtime wages, failure to pay minimum wages, failure to timely pay all wages during employment, failure to pay all wages to discharged and quitting employees, failure to furnish accurate itemized wage statements, failure to maintain and produce records, failure to indemnify employees for necessary business expenditures incurred in discharge of duties, and unfair business practices in violation of Labor Code sections 200-203, 204, 206.5, 210, 221, 223, 224, 225.5, 226, 226.3, 226.7, 510, 512, 515, 558, 558.1, 1174, 1174.5, 1182.12, 1193.6, 1194, 1194.2, 1197, 1197.1, 1198, 1199, 2800, 2802, IWC Wage Order No. 5-2001, and Business & Professions Code section 17200 et seq.. Except as set forth in Section 5.3 of this Agreement, Participating Class Members do not release any other claims, including claims for vested benefits, wrongful termination, violation of the Fair Employment and Housing Act, unemployment insurance, disability, social security, workers' compensation or claims based on facts occurring outside the Class Period. Except as set forth in Section 5.3 of the Settlement Agreement, Participating Class Members do not release any other claims, including claims for vested benefits, wrongful termination, violation of the Fair Employment and Housing Act, unemployment insurance, disability, social security, workers' compensation, or claims based on facts occurring outside the Class Period.

9. Aggrieved Employees' PAGA Release. After the Court's judgment is final, and Defendant has paid the Gross Settlement (and separately paid the employer-side payroll taxes), all Aggrieved Employees will be barred from asserting PAGA claims against Defendant, whether or not they exclude themselves from the Settlement. This means that all Aggrieved Employees, including those who are Participating Class Members and those who opt-out of the Class Settlement, cannot sue, continue to sue or participate in any other PAGA claim against Defendant or its related entities based on the PAGA Period facts alleged in the Action and resolved by this Settlement.

The Aggrieved Employees' Releases for Participating and Non-Participating Class Members are as follows:

> Plaintiff releases the Released Parties, from all claims for statutory PAGA penalties that could have been sought by the Labor Commissioner for the violations identified in the Operative Complaints and the PAGA Notice, including alleged violations of the California Labor Code and the Industrial Welfare Commission Wage Order(s)

during the PAGA Period for alleged: failure to provide meal periods, failure to provide rest periods, failure to pay regular and overtime wages, failure to pay minimum wages, failure to timely pay all wages during employment, failure to pay all wages to discharged and quitting employees, failure to furnish accurate itemized wage statements, failure to maintain and produce records, and failure to indemnify employees for necessary business expenditures incurred in discharge of duties, in violation of Labor Code sections 200-203, 204, 206.5, 210, 221, 223, 224, 225.5, 226, 226.3, 226.7, 510, 512, 515, 558, 558.1, 1174, 1174.5, 1182.12, 1193.6, 1194, 1194.2, 1197, 1197.1, 1198, 1199, 2800, 2802, and IWC Wage Order No. 5-2001. Plaintiff does not release any Aggrieved Employees' claims for wages or damages, except that Class Members who do not exclude themselves from the Settlement do release claims for wages or damages, as noted above.

4. HOW WILL THE ADMINISTRATOR CALCULATE MY PAYMENT?

1. Individual Class Payments. The Administrator will calculate Individual Class Payments by (a) dividing the Net Settlement Amount by the total number of Workweeks worked by all Participating Class Members, and (b) multiplying the result by the number of Workweeks worked by each individual Participating Class Member.

2. Individual PAGA Payments. The Administrator will calculate Individual PAGA Payments by (a) dividing $2,500.00 by the total number of PAGA Pay Periods worked by all Aggrieved Employees and (b) multiplying the result by the number of PAGA Period Pay Periods worked by each individual Aggrieved Employee.

3. Workweek/Pay Period Challenges. The number of Class Workweeks you worked during the Class Period and the number of PAGA Pay Periods you worked during the PAGA Period, as recorded in Defendant's records, are stated in the first page of this Notice. You have until _____ to challenge the number of Workweeks and/or Pay Periods credited to you. You can submit your challenge by signing and sending a letter to the Administrator via mail, email or fax. Section 9 of this Notice has the Administrator's contact information.

   You need to support your challenge by sending copies of pay stubs or other records. The Administrator will accept Defendant's calculation of Workweeks and/or Pay Periods based on Defendant's records as accurate unless you send copies of records containing contrary information. You should send copies rather than originals because the documents will not be returned to you. The Administrator will resolve Workweek and/or Pay Period challenges based on your submission and on input from Class Counsel (who will advocate on behalf of Participating Class Members) and Defendant's Counsel. The Administrator's decision is final. You can't appeal or otherwise challenge its final decision.

5. HOW WILL I GET PAID?

1. Participating Class Members. The Administrator will send, by U.S. mail, a single check to every Participating Class Member (i.e., every Class Member who doesn't opt-out) including those who also qualify as Aggrieved Employees. The single check will combine the Individual Class Payment and the Individual PAGA Payment.

2. Aggrieved Employees. The Administrator will send, by U.S. mail, a single Individual

PAGA Payment check to every Aggrieved Employee who opts out of the Class Settlement (i.e., every Non-Participating Class Member).

Your check will be sent to the same address as this Notice. If you change your address, be sure to notify the Administrator as soon as possible. Section 9 of this Notice has the Administrator's contact information.

6. HOW DO I OPT-OUT OF THE CLASS SETTLEMENT?

Submit a written and signed letter with your name, present address, telephone number and a simple statement that you do not want to participate in the Settlement. The Administrator will exclude you based on any writing communicating your request be excluded. Be sure to personally sign your request, identify the Action as CVRI2306412, and include your identifying information (full name, address, telephone number, approximate dates of employment and social security number for verification purposes). You must make the request yourself. If someone else makes the request for you, it will not be valid. **The Administrator must be sent your request to be excluded by _____, or it will be invalid.** Section 9 of the Notice has the Administrator's contact information.

7. HOW DO I OBJECT TO THE SETTLEMENT?

Only Participating Class Members have the right to object to the Settlement. Before deciding whether to object, you may wish to see what Plaintiff and Defendant are asking the Court to approve. At least ___ days before the _____ Final Approval Hearing, Class Counsel and/or Plaintiff will file in Court (1) a Motion for Final Approval that includes, among other things, the reasons why the proposed Settlement is fair, and (2) a Motion for Fees, Litigation Expenses and Service Award stating (i) the amount Class Counsel is requesting for attorneys' fees and litigation expenses; and (ii) the amount Plaintiff is requesting as a Class Representative Service Award. Upon reasonable request, Class Counsel (whose contact information is in Section 9 of this Notice) will send you copies of these documents at no cost to you. You can also view them on the Administrator's Website _____(url)_____ or the Court's website https://epublic-access.riverside.courts.ca.gov/public-portal/?q=user/login&destination=node/379.

A Participating Class Member who disagrees with any aspect of the Agreement, the Motion for Final Approval and/or Motion for Fees, Litigation Expenses and Service Award may wish to object, for example, that the proposed Settlement is unfair, or that the amounts requested by Class Counsel or Plaintiff are too high or too low. **The deadline for sending written objections to the Administrator is _____**. Be sure to tell the Administrator what you object to, why you object and any facts that support your objection. Make sure you identify the Action CVRI2306412 and include your name, current address, telephone number and approximate dates of employment for Defendant and sign the objection. Section 9 of this Notice has the Administrator's contact information.

Alternatively, a Participating Class Member can object (or personally retain a lawyer to object at your own cost) by attending the Final Approval Hearing. You (or your attorney) should be ready to tell the Court what you object to, why you object, and any facts that support your objection. See Section 8 of this Notice (immediately below) for specifics regarding the Final Approval Hearing.

You cannot object to the PAGA portion of the Settlement.

8. CAN I ATTEND THE FINAL APPROVAL HEARING?

You can, but don't have to, attend the Final Approval Hearing on _____ at ___(time)____ in Department __ of the Riverside Superior Court, located at _____, Riverside, CA 92501. At the Hearing, the judge will decide whether to grant Final Approval of the Settlement and how much of the Gross Settlement will be paid to Class Counsel, Plaintiff and the Administrator. The Court will invite comment from objectors, Class Counsel and Defense Counsel before making a decision. You can attend (or hire a lawyer to attend) either personally or remotely via https://www.riverside.courts.ca.gov/remoteappearance. Check the Court's website for the most current information.

It's possible the Court will reschedule the Final Approval Hearing. You should check the Administrator's website _____ beforehand or contact Class Counsel to verify the date and time of the Final Approval Hearing.

9. HOW CAN I GET MORE INFORMATION?

The Class Action and PAGA Settlement Agreement sets forth everything Defendant and Plaintiff have promised to do under the proposed Settlement. The easiest way to read the Agreement, the Judgment or any other Settlement documents is to go to the Administrator's website at __(url)___. You can also telephone or send an email to Class Counsel or the Administrator using the contact information listed below, or consult the Superior Court website by going to (https://epublic-access.riverside.courts.ca.gov/public-portal/?q=user/login&destination=node/379) and entering the Case Number for the Action, Case No. CVRI2306412. You can also make an appointment to personally review court documents in the Clerk's Office at the Riverside courthouse by calling (951) 777-3147. The courthouse is located at 4050 Main Street, Riverside, California 92501.

DO NOT TELEPHONE THE SUPERIOR COURT TO OBTAIN INFORMATION ABOUT THE SETTLEMENT.

Class Counsel:
John Yslas
jyslas@wilshirelawfirm.com
Samantha A. Smith
samantha.smith@wilshirelawfirm.com
Diego Aviles
daviles@wilshirelawfirm.com
Wilshire Law Firm
3055 Wilshire Blvd. 12th Floor, Los Angeles, CA 90010
Telephone: 213-381-9988

Settlement Administrator:
Phoenix Class Action Administration Solutions
Email Address:
Mailing Address:
Telephone:
Fax Number:

10. WHAT IF I LOSE MY SETTLEMENT CHECK?

If you lose or misplace your settlement check before cashing it, the Administrator will replace it as long as you request a replacement before the void date on the face of the original check. If your check is already void, you should consult the Unclaimed Property Fund for instructions on how to retrieve the funds

11. WHAT IF I CHANGE MY ADDRESS?

To receive your check, you should immediately notify the Administrator if you move or otherwise change your mailing address.

EXHIBIT 2
to Exhibit F

Rachel Sanger v. Southern California Veterinary Center, Inc. dba Southern California Veterinary Center
Riverside County Superior Court Case Nos. CVRI2306412 (Lead) & CVRI2400368

||||||||||||||||||||||||||||||||
<<PSA ID>>
<<First Last>>
<<Address>>
<<City, State, Zip, Country>>

Name/Address Changes (if any):

_____
_____
_____

EXCLUSION REQUEST FORM

Use and return this form only if you wish to be excluded from the Class and do not wish to receive an Individual Class Payment. If you exclude yourself from the Class by signing and returning this form, you will not receive your Individual Class Payment, you will not be subject to the terms of the Class Settlement, and you will retain whatever rights you may currently have. Aggrieved Employees will receive a pro-rata share of the PAGA portion of the settlement, regardless of whether they opt out of the Class Settlement.

If you wish to remain in the Class and receive a settlement payment, you may disregard this form. You do not need to do anything, and you will receive a check by U.S. Mail.

To be valid, your Exclusion Request Form must (a) include your full name, address, and last four digits of your Social Security number, (b) be signed by you, and (c) be returned to the Settlement Administrator via fax, e-mail, or U.S. Mail on or before _____, 2025.

I HEREBY CONFIRM THAT I HAVE RECEIVED NOTICE OF THE PROPOSED SETTLEMENT IN THE *SANGER V. SOUTHERN CALIFORNIA VETERINARY CENTER, INC.* ACTION AND I WISH TO EXCLUDE MYSELF FROM THE SETTLEMENT REACHED IN THE MATTER OF *SANGER V. SOUTHERN CALIFORNIA VERTERINARY CENTER, INC.* I UNDERSTAND THAT BY EXCLUDING MYSELF, I WILL NOT RECEIVE ANY MONEY FROM THE CLASS SETTLEMENT REACHED IN THIS MATTER BUT MAY STILL BE ELIGIBLE FOR PAYMENT UNDER THE PORTION OF THE SETTLEMENT ALLOCATED UNDER PAGA.

Dated: _____ **Signature:** _____

Last Four Digits of SSN: _____ **Printed Name:** _____

What is the Settlement Administrator's address?

Sanger v. Southern California Veterinary Center, Inc.
c/o Phoenix Settlement Administrators
P.O. Box 7208
Orange, CA 92863
T: (800) 523-5773
F: _____

E-mail: _____

EXHIBIT 3
to Exhibit F

Rachel Sanger v. Southern California Veterinary Center, Inc. dba Southern California Veterinary Center
Riverside County Superior Court Case Nos. CVRI2306412 (Lead) & CVRI2400368

||||||||||||||||||||||||||||||||
<<PSA ID>>
<<First Last>>
<<Address>>
<<City, State, Zip, Country>>

Name/Address Changes (if any):

_____
_____
_____

OBJECTION FORM

Use and return this form only if you wish to object to the settlement. If your objection is rejected by the Court, you will receive your Individual Settlement Payment, you will be subject to the terms of the Settlement, and you will release whatever rights you may currently have.

To be valid, your Objection Form must (a) include your full name, address, last four digits of your Social Security number, and dates of employment, (b) include the nature and basis for your objection, (c) be signed by you, and (d) be returned to the Settlement Administrator via fax, e-mail, or U.S. Mail on or before _____, 2025.

I object to the settlement in *Sanger v. Southern California eterinary Center, Inc.* because _____

_____
_____
_____
_____
_____
_____
_____

Dated: _____ **Signature:** _____

Last Four Digits of SSN: _____ **Printed Name:** _____

Please attach copies (not originals) of any supporting documents you have. The Settlement Administrator may contact you for further information.

What is the Settlement Administrator's address?

Sanger v. Southern California Veterinary Center, Inc.
c/o Phoenix Settlement Administrators
P.O. Box 7208
Orange, CA 92863
T: (800) 523-5773
F: _____
E-mail: _____

Questions? Please call the Settlement Administrator at 1-800-523-5773
PLEASE DO NOT CALL THE COURT ABOUT THIS FORM

WILSHIRE LAW FIRM, PLC
3055 Wilshire Blvd, 12th Floor
Los Angeles, CA 90010-1137

PROOF OF SERVICE

Rachel Sanger v. Southern California Veterinary Center, Inc.
County of Riverside Case No.: CVRI2306412

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Christina Hicklin, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12th Floor, Los Angeles, California 90010. My electronic service address is christina.hicklin@wilshirelawfirm.com.

On May 14, 2025, I served the foregoing:

- **Supplemental Declaration of Lisa B. Iturriaga in support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement**

on the interested parties as follows:

Todd B. Scherwin - E-Mail: tscherwin@fisherphillips.com
Shaun J. Voigt - E-Mail: svoigt@fisherphillips.com
Jacob P. Waschak - Email: jwaschak@fisherphillips.com
FISHER & PHILLIPS LLP
444 South Flower Street, Suite 1500
Los Angeles, CA 90071
Tel: (213) 330-4500; Fax: (213) 330-4501

Attorneys for Defendant SOUTHERN CALIFORNIA VETERINARY CENTER, INC. dba SOUTHERN CALIFORNIA VETERINARY CENTER

(X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the person at the email addresses listed above using One Legal.

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

Executed on May 14, 2025, at Los Angeles, California.

Christina Hicklin