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Attorneys for Plaintiff MARIA RODRIGUEZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF VENTURA**

MARIA RODRIGUEZ, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

CLINICAS DEL CAMINO REAL, INC., a
California nonprofit corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 2024CUOE020097

[Assigned for all purposes to the Hon.
Benjamin F. Coats, Dept. 43]

**SUPPLEMENTAL DECLARATION OF
JODEY LAWRENCE OF PHOENIX
SETTLEMENT ADMINISTRATORS IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL**

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1 a potential incident must immediately notify Phoenix's Compliance and Information Security
2 teams.

3 9. **Investigation and Containment Procedures:** Upon receiving notice of a
4 suspected breach or mishandling event, Phoenix initiates an internal investigation to determine
5 scope, cause, and impact. Phoenix takes immediate steps to contain the incident, secure affected
6 systems or funds, and prevent additional unauthorized access or transactions.

7 10. **Notification Protocols:** If a breach of confidential or personal information is
8 confirmed, Phoenix follows all applicable legal and contractual notification requirements. This
9 includes timely notification to counsel, affected Parties, and, when necessary, regulatory
10 agencies. Phoenix provides details of the incident, corrective actions taken, and any
11 recommended steps for impacted individuals.

12 11. **Remediation and Corrective Action** Phoenix promptly implement corrective
13 measures to address identified vulnerabilities and prevent future incidents. This may include
14 system enhancements, employee retraining, policy updates, or additional monitoring
15 mechanisms.

16 12. **Detection of Financial Irregularities:** Any discrepancies, unauthorized
17 transactions, or indications of mishandling are immediately escalated to Phoenix's Finance and
18 Compliance teams. Phoenix reviews bank records, transaction logs, and authorization records to
19 determine the root cause.

20 13. **Response to Mishandling of Funds:** If mishandling is confirmed, Phoenix
21 takes immediate steps to correct the error, notify counsel, and implement appropriate
22 safeguards. Phoenix may temporarily suspend affected processes until the issue is resolved,
23 ensuring full accountability and documentation.

24 14. Phoenix will establish a static case website, where the Notice, key case
25 documents, and the Final Judgment will be posted and available for viewing and download. The
26 website address will be Rodriguez-v-ClinicasDelCaminoReal.phoenixcases.com.
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I declare under penalty of perjury under the laws of the United States and state of California that the foregoing is true and correct.

Executed on November 19, 2025 at Orange, California.


Jodey Lawrence