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Attorneys for Plaintiff
MARIA RODRIGUEZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE 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.

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
(Consolidated with Case No.: 2024CUOE023496)

*[Assigned for all purposes to the Hon. Charmaine
Buehner, Dept. J4]*

**SUPPLEMENTAL DECLARATION OF SCOTT
M. LIDMAN IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 29, 2025
Time: 8:30 a.m.
Dept.: J4

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I, SCOTT M. LIDMAN, declare as follows:

1. I am a shareholder and principal of the law firm Lidman Law, APC, and counsel for the named Plaintiff Maria Rodriguez (“Plaintiff”) and the proposed Settlement Class in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. On September 12, 2025, Plaintiff filed her Motion for Preliminary Approval of Class Action Settlement (“Motion”).

3. Within Plaintiff's Motion and per the Settlement Agreement, Plaintiff defines the Settlement Class as, "All current and former non-exempt, hourly employees of Defendant Clinicas Del Camino Real, Inc. ['Defendant'] who worked at any time in California during the Class Period." The Class Period is "the time period of June 29, 2022 through the date of preliminary approval by the Court of the Settlement."

4. The Settlement Agreement contains an Escalator Clause which, should the total number of workweeks exceed 103,300 by more than ten percent, gives Defendant the option to either (1) increase the Gross Settlement Amount or (2) cut off the Class Period before the total number of workweeks increases above the ten percent. Defendant may exercise option (2) so long as it does so before Plaintiff's motion for approval is filed. Settlement, ¶ 5.F.

5. On September 8, 2025, defense counsel informed my office that Defendant intended to exercise its option under the Escalator Clause to cut off the class period before the workweeks exceeded 103,300 by more than ten percent, and that Plaintiff's counsel would be informed of the date by the end of the week. A true and correct copy of defense counsel's e-mail is attached hereto as **Exhibit A**.

6. On September 12, 2025, Plaintiff filed and served her Motion. Within minutes of electronic service of Plaintiff's Motion, defense counsel informed my office that the class period should be cut off on August 1, 2025. A true and correct copy of defense counsel's e-mail is attached hereto as **Exhibit B**.

7. Because defense counsel expressed Defendant's intention to exercise option (2) under the Escalator Clause prior to Plaintiff filing her Motion, the parties will abide by the Settlement Agreement and cut off the Class Period on August 1, 2025.

8. Per Paragraph 5.F. of the Settlement Agreement, the Class Period is now defined as “the time period of June 29, 2022 through August 1, 2025.”

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

Executed on September 22, 2025, at El Segundo, California.


Scott M. Lidman

EXHIBIT A

EXHIBIT A

From: [Mannix, Steven](#)
To: [Tiara Gose-Hardy](#)
Cc: [Scott Lidman](#); [Richardson, Lyne](#); [Milan Moore](#)
Subject: RE: Rodriguez v. Clinicas del Camino Real - Mediator's Proposal
Date: Monday, September 8, 2025 11:47:43 AM
Attachments: [image001.png](#)

Thanks. We have the option to cut off the class period before the escalator is reached pursuant to section 5F. I am looking into it now; I just want to make sure you don't file the paperwork before we've had the opportunity to get that date to you. I should have the class period cut off date by the end of the week.

Steven Mannix | Ogletree Deakins

19191 S. Vermont Avenue, Suite 635 | Torrance, CA 90502 | Telephone: 310-965-2081
steven.mannix@ogletree.com | www.ogletree.com | [Bio](#)

From: Tiara Gose-Hardy <tgose@lidmanlaw.com>
Sent: Monday, September 8, 2025 11:30 AM
To: Mannix, Steven <steven.mannix@ogletreedekins.com>
Cc: Scott Lidman <slidman@lidmanlaw.com>; Richardson, Lyne <lyne.richardson@ogletreedekins.com>; Milan Moore <mmoore@lidmanlaw.com>
Subject: RE: Rodriguez v. Clinicas del Camino Real - Mediator's Proposal

[Caution: Email received from external source]

We are just waiting on the order re consolidation. The Class Period runs through Preliminary Approval, and the hearings are being set for early October. I imagine having a hearing date mid-October. I'll give you a more specific date when it is available.

Tiara Gose-Hardy, Esq.
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From: Mannix, Steven <steven.mannix@ogletree.com>
Sent: Monday, September 8, 2025 11:06 AM
To: Milan Moore <mmoore@lidmanlaw.com>
Cc: Scott Lidman <slidman@lidmanlaw.com>; Richardson, Lyne <lyne.richardson@ogletreedekins.com>; Tiara Gose-Hardy <tgose@lidmanlaw.com>
Subject: RE: Rodriguez v. Clinicas del Camino Real - Mediator's Proposal

Tiara,

When do you intend to file the approval paperwork? I need to get you the class period cut off date before you file.

Steven Mannix | Ogletree Deakins

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steven.mannix@ogletree.com | www.ogletree.com | [Bio](#)

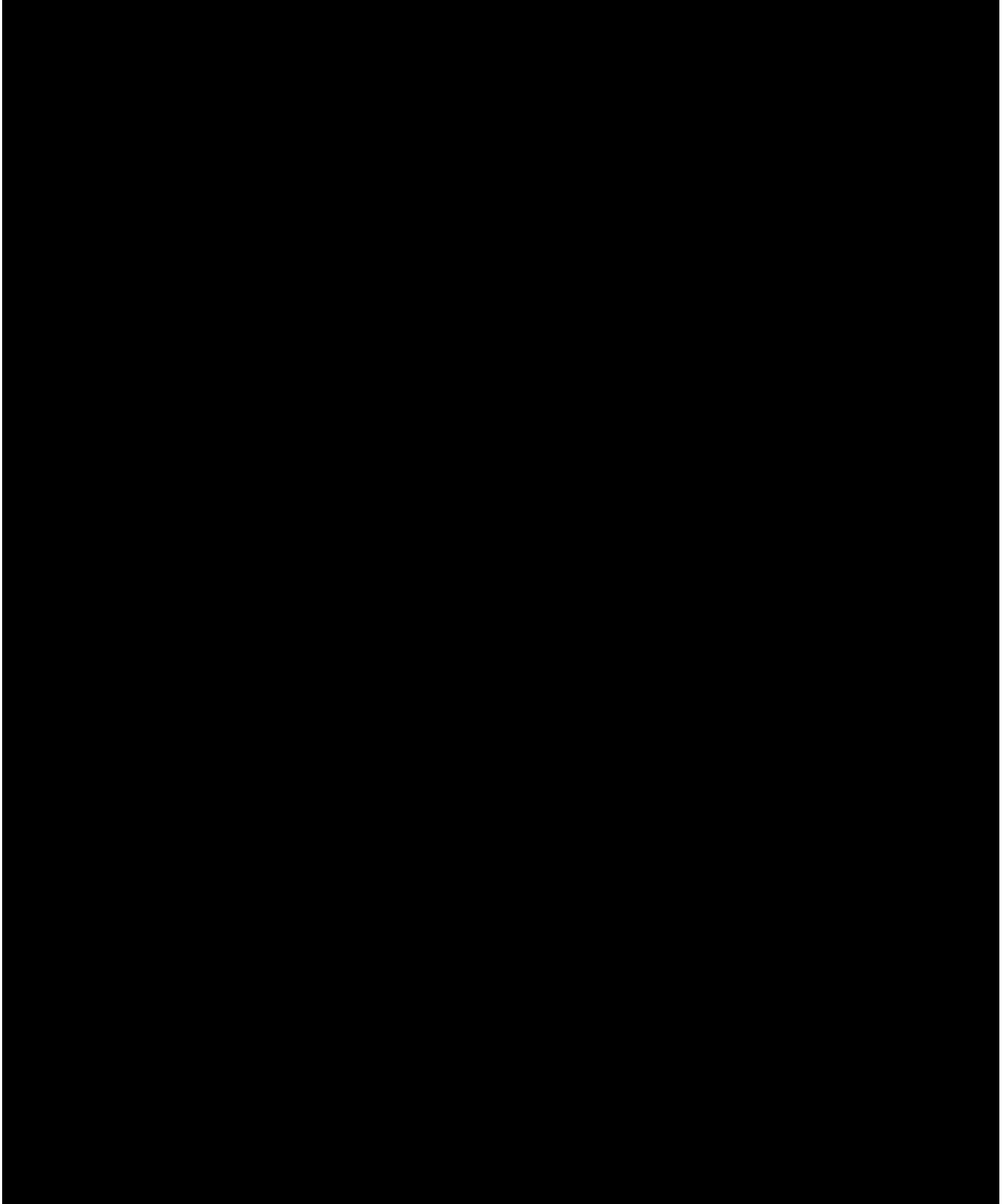


EXHIBIT B

EXHIBIT B

From: [Mannix, Steven](#)
To: [Marlyn Ajanel](#); [Richardson, Lyne](#); [Martis, Carolina S.](#)
Cc: [Scott Lidman](#); [Milan Moore](#); [Tiara Gose-Hardy](#); [Gladys Beltran](#)
Subject: RE: Maria Rodriguez v. Clinicas Del Camino Real, Inc., Case No. 2024CUOE020097 | E-Service
Date: Friday, September 12, 2025 4:29:17 PM

Tiara,

We need to the class cut off date in the motion changed. It should be August 1, 2025. I let you know of our intention to cut the period off pursuant to Section 5F of the settlement agreement earlier this week. Hopefully the paperwork wasn't filed yet and it can be a quick fix.

Thanks.

Steven Mannix | Ogletree Deakins

19191 S. Vermont Avenue, Suite 635 | Torrance, CA 90502 | Telephone: 310-965-2081
steven.mannix@ogletree.com | www.ogletree.com | [Bio](#)

From: Marlyn Ajanel <majanel@lidmanlaw.com>
Sent: Friday, September 12, 2025 3:58 PM
To: Richardson, Lyne <lyne.richardson@ogletree.com>; Mannix, Steven <steven.mannix@ogletreedekins.com>; Martis, Carolina S. <carolina.martis@ogletreedekins.com>; Claxton, Linda <linda.claxton@ogletree.com>
Cc: Scott Lidman <slidman@lidmanlaw.com>; Milan Moore <mmoore@lidmanlaw.com>; Tiara Gose-Hardy <tgose@lidmanlaw.com>; Gladys Beltran <gbeltran@lidmanlaw.com>
Subject: Maria Rodriguez v. Clinicas Del Camino Real, Inc., Case No. 2024CUOE020097 | E-Service
Importance: High

[Caution: Email received from external source]

Counsel,

Please find attached the following documents for service:

1. **Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof**
2. **Declaration of Milan Moore in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement**
3. **Declaration of Scott M. Lidman in Support of Motion for Preliminary Approval of Class Action Settlement**
4. **Declaration of Tiara Gose-Hardy in Support Motion for Preliminary Approval of Class Action Settlement**
5. **Declaration of Paul K. Haines in Support of Motion for Preliminary Approval of Class**

Action Settlement

6. **Declaration of Plaintiff Maria Rodriguez in Support of Motion for Preliminary Approval of Class Action Settlement**
7. **Declaration of Jodey Lawrence of Phoenix Settlement Administrators in Support of Motion for Preliminary Approval of Class Action Settlement**
8. **[Proposed] Order Granting Preliminary Approval of Class Action Settlement**
9. **Proof of Service on LWDA Re: Plaintiff's Motion for Preliminary Approval of Class Action Settlement**
10. **Proof of Service**

Thank you,

Marlyn Ajanel

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