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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

MERCEDES BOLANOS, individually and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act;

Plaintiff,

vs.

LASALLE MEDICAL ASSOCIATES, a
California corporation; and DOES 1 through
100, inclusive,

Defendant.

Case No. CIVSB2132847

Honorable Jessica Morgan
Department S26

CLASS ACTION

**DECLARATION OF MERCEDES
BOLANOS IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Elizabeth Parker-Fawley); and
[Proposed] Order filed concurrently
herewith]

Date: September 5, 2024
Time: 8:30 a.m.
Department: S26

Complaint Filed: November 3, 2021
Trial Date: None Set

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5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **3 hours** reviewing the settlement agreement and about **2 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the Class and seek relief for the PAGA Employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me a service payment in the amount of \$9,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers for Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a service payment, as well as my share of the settlement as a Class Member and as a PAGA Employee.

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

Executed this 8th day of August 2024, at Bloomington, California.

Electronically Signed _____ 2024-08-08 19:34:57 UTC - 174.195.193.115



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Mercedes Bolanos