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Attorneys for Plaintiff GREGORIO PINEDA,
individually and on behalf of others similarly
situated

[Additional counsel listed on next page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

GREGORIO PINEDA, individually and on
behalf of others similarly situated,

Plaintiff,

vs.

ORTHOPAEDIC HOSPITAL dba
ORTHOPAEDIC INSTITUTE FOR
CHILDREN AND LUSKIN ORTHOPAEDIC
INSTITUTE FOR CHILDREN, a California
Nonprofit Corporation; ORTHOPAEDIC
HOSPITAL MEDICAL GROUP, INC., a
California Corporation; ORTHOPAEDIC
INSTITUTE FOR CHILDREN
AMBULATORY SURGERY CENTER, LLC, a
California Limited Liability Company;
ORTHOPAEDIC INSTITUTE FOR
CHILDREN FOUNDATION, a California
Nonprofit Corporation; and DOES 1 through 25,
inclusive,

Defendants.

Case No. 24STCV01618

[Consolidated with Case Nos. 24STCV07307,
24STCV03460, and 24STCV10042]

Honorable Elihu M. Berle
Department 6

**DECLARATION OF CASSANDRA
POLITES OF ILYM GROUP, INC.
REGARDING WORKWEEKS
CALCULATION**

Date: January 9, 2026
Time: 10:00 a.m.
Dept.: 6

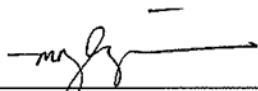
Complaint Filed: January 19, 2024
Trial Date: Not Set

1 I, Cassandra Polites, declare as follows:

2 1. I am a resident of the United States of America and am over the age of 18. I am a
3 Case Manager for ILYM Group, Inc., (herein after referred to as "ILYM Group"), a professional
4 settlement services provider. I am authorized to make this declaration on behalf of ILYM Group
5 and myself. I have personal knowledge of the facts herein, and, if called upon to testify, I could and
6 would testify competently to such facts.

7 2. Based on the class data provided to our office, there are 401 class members who
8 worked 41,884.15 workweeks during the Class Period. Therefore, the escalator clause has not been
9 triggered in the above captioned matter.

10
11 I declare under penalty of perjury under the laws of the State of California and the United
12 States that the foregoing is true and correct to the best of my knowledge and that this Declaration
13 was executed this 9th day of December 2025, at Tustin, California.

14
15
16 
17 _____
CASSANDRA POLITES