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Attorneys for Defendant BLVD Residential Inc.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN MATEO

ANTONIO URRUTIA, an individual, on
behalf of himself, others similarly situated,

Plaintiff,

v.

BLVD RESIDENTIAL INC., a Delaware
Corporation, DEBRA O'TOOLE, an
individual, and DOES 2 thru 50, inclusive,

Defendants.

Case No.: 24-CIV-00086

[Assigned For All Purposes to the Hon. Nicole
S. Healy, Dept. 28]

**DECLARATION OF DEBRA O'TOOLE IN
SUPPORT OF PRELIMINARY
APPROVAL**

Date: December 17, 2025

Time: 2:00 pm

Dept: 28

Date Filed: January 1, 2024

FAC Filed: March 12, 2024

Trial Date: None Set

1 I, Debra O'Toole, declare and state as follows:

2 1. I am currently employed by Defendant BLVD Residential, Inc. ("BLVD") as the
3 Senior Director of Human Resources for its operations and I maintain an office at 4080 Campbell
4 Ave., Menlo Park, CA 94025. I have personal knowledge of the facts set forth below, except those
5 facts set forth upon information and belief. As to those facts, I believe them to be true. If called as
6 a witness, I could and would testify competently to the facts set forth below. I am authorized to
7 provide this Declaration, and I submit this Declaration in support of the Motion for Preliminary
8 Approval of Class Settlement in the above captioned case.

9 2. I have reviewed the settlement agreement pertaining to the above-captioned case
10 and I understand the terms stated therein. Following my review and based on my understanding of
11 the settlement amount and payment terms in the settlement agreement, I affirm that I cannot afford
12 to personally fund the settlement based on the terms listed therein.

13 3. My attorneys and I do not have any interest and/or involvement with the governance
14 of CASA of San Mateo County who the Parties propose to designate as the *cy pres* beneficiary under
15 Code of Civil Procedure § 384.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing
17 is true and correct. Executed on this 04 day of September, 2025 in Menlo Park, California.

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19 *Debra OToole*
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21 Debra O'Toole
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