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Attorneys for Defendant,
WORKCARE, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

JAVIER LOERA, JUSTINA VILLAREAL, AUBREY CONNAGHAN, and KRISTINE STEVENSON, individually and on behalf of other similarly situated employees, Plaintiffs, v. WORKCARE, INC.; and DOES 1 through 25, inclusive, Defendants.	CASE NO.: 24STCV14766 **DECLARATION OF MARIA PITOL** Dept.: 6 Judge: Hon. Elihu M. Berle Filed: June 12, 2024 Trial: Not Set

I, Maria Pitol, declare as follows:

1. I am the Chief Financial Officer of Defendant WORKCARE, INC. ("Defendant"), a party in the above-captioned case. I am familiar with the facts and proceedings of this case and if called as a witness, I could and would competently testify to the following facts of my own personal knowledge. I am over the age of 18 and have personal knowledge of all matters set forth herein, except for those matters which are expressly based upon my information and belief. I am informed and believe that all such matters are true.

2. I am informed and believe that there are no actual or potential conflicts of interest with the administrator Apex.

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3. I am informed and believe that there are no other pending matters or actions against Defendant that would be extinguished or adversely affected by the settlement of this action.

4. Defendant has incurred considerable financial hardship in recent years. Due to rising costs of conducting business in this industry, Defendant cannot fund the gross settlement amount without an installment plan.

5. Due to the size of the settlement, Defendant requires a payment plan with installment payments. Defendant paid the first installment to the settlement administrator by mailing a check on September 1, 2026. Defendant's second installment will be due 30 days following Final Approval of the Settlement or by January 1, 2027 (whichever is first), and then have nine monthly installments following thereafter until the gross settlement amount is fully paid. There will be eleven total installment payments.

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

Executed on 10/19/2026, at Orange, California.

Maria Pitol

Maria Pitol