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Attorneys for Plaintiff, the Class, and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA

SARAH ROBERTS-COOPER, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

RISE LUXURY REHAB, LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 2024CUOE033989

[Assigned to the Hon. Charmaine H. Buehner,
Dept. 44]

**DECLARATION OF KRISTEN M. AGNEW IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: July 29, 2026
Time: 1:30 p.m.
Dept.: 44

Action Filed: December 4, 2024
Trial Date: None Set

1
2 I, Kristen M. Agnew, declare as follows:

3 1. I am an attorney at law, duly licensed to practice before all courts in the State of
4 California, and am with the law firm Diversity Law Group, P.C., counsel of record for Plaintiff
5 Sarah Roberts-Cooper (“Plaintiff”). I have personal knowledge of the facts set forth below and if
6 called to testify I could and would do so competently.

7 2. I am one of the primary attorneys on this case. From the inception of the case, Class
8 Counsel has zealously represented the interests of the Class. I have no conflicts with the Class and
9 will adequately represent the Class.

10 **FAIRNESS OF THE SETTLEMENT**

11 3. The Joint Stipulation and Settlement of Class Action Claims and Amendment to
12 the Joint Stipulation of Class and Representative Action Settlement (“Amendment”) (collectively,
13 the “Settlement Agreement” or “Settlement”) entered into by Plaintiff and Defendants Rise Luxury
14 Rehab, LLC (“Rise Luxury”) and Ascensions Treatment Center, LLC (“Ascensions”) (collectively,
15 “Defendants”) was the product of negotiations between highly able and experienced attorneys on
16 both sides who possessed the relevant data and extensive legal research which they had carefully
17 analyzed. Based on my experience and evaluation of the claims, defenses, and risks of continued
18 litigation, I believe the Settlement is fair, reasonable, adequate, and in the best interests of the
19 Class.

20 4. Attached hereto as **Exhibit A** is a true and correct copy of the Amendment to the
21 Joint Stipulation of Class and Representative Action Settlement (“Amendment”).

22 **PROCEDURAL HISTORY AND BACKGROUND**

23 5. On September 26, 2024, Plaintiff submitted a PAGA notice to the Labor &
24 Workforce Development Agency alleging that Rise Luxury engaged in policies and practices that
25 resulted in violations of Labor Code §§ 201, 202, 203, 204, 226, 226.7, 510, 512, 558, 1194, 1197,
26 and 1197.1. Shortly thereafter, on October 14, 2024, Plaintiff submitted an amended notice to the
27 LWDA for the purpose of correcting Rise Luxury’s address.

28 6. On December 4, 2024, Plaintiff filed a class and representative action complaint

1 against Rise Luxury in the Superior Court of California for the County of Ventura (the “Action”),
2 based on the above violations.

3 7. On or about February 25, 2025, Rise Luxury filed an answer to the initial complaint.
4 Rise Luxury denied the allegations in the initial complaint, and denied any and all liability for the
5 causes of action.

6 8. On April 21, 2025, Plaintiff submitted a supplemental PAGA notice to the LWDA
7 alleging that Rise Luxury also violated Labor Code §§ 226, 1174, and 1174.5. Attached hereto as
8 **Exhibit B** is a true and correct copy of the April 21, 2025 supplemental PAGA Notice.

9 9. On or about February 26, 2025, the Parties agreed to participate in private mediation
10 with the Honorable Lisa Cole (Ret.). In advance of mediation, Defendants provided Class Counsel
11 with the number of Class Members who were employed during the period of December 20, 2020
12 through July 17, 2025, the number of separated Class Members, and the number of Aggrieved
13 Employees who were employed during the period of December 20, 2020 through July 17, 2025.
14 Defendant also produced a 25% sample of time and payroll records for Aggrieved Employees,
15 wage statements, and handbook and policy documents. Class Counsel retained an expert to analyze
16 the sample time and payroll records and run any extrapolation.

17 10. On July 17, 2025, the Parties participated in a full-day mediation with the Hon. Lisa
18 Cole (Ret.). As a result of the mediation, the Parties reached the present class and PAGA
19 settlement. The negotiations were conducted at arm’s length.

20 11. To effectuate the Settlement, on August 22, 2025, Plaintiff filed a supplemental
21 PAGA notice with the LWDA, adding Ascensions as an additional employer and alleging violation
22 of Labor Code § 2802. Additionally, on September 17, 2025, Plaintiff filed the operative First
23 Amended Class and Representative Action Complaint (the “Operative Complaint”). The
24 Operative Complaint adds Ascensions as a named defendant, amends the sixth cause of action to
25 include PAGA penalties predicated on an alleged violation of Labor Code § 2802, and adds a
26 seventh cause of action for violation of Labor Code § 2802.

27 12. As set forth in the Operative Complaint, Plaintiff alleges causes of action for: (i)
28 failure to pay wages, in violation of Labor Code §§ 201-203, 510, 558, 1194, 1197, and 1197.1;

(ii) failure to provide off-duty meal periods or pay meal period premium compensation in lieu thereof, in violation of Labor Code §§ 226.7 and 512; (iii) failure to provide off-duty rest periods or pay rest period premium compensation in lieu thereof, in violation of Labor Code § 226.7; (iv) failure to provide accurate itemized wage statements, in violation of Labor Code § 226; (v) unfair business practices, in violation of Business and Professions Code § 17200, *et seq.* (the “UCL”); (vi) penalties pursuant to the Private Attorneys General Act (“PAGA”), Labor Code § 2698, *et seq.*; and (vii) failure to reimburse business expenses, in violation of Labor Code § 2802.

13. The operative complaint alleges that Plaintiff and Class Members were regularly required to perform work after clocking out at the end of her shift and was not paid wages for that off-the-clock work. The operative complaint further alleges that Defendants failed to provide Plaintiff and Class Members with compliant off-duty meal and rest periods. Specifically, Plaintiff alleges that Defendants routinely failed to provide a complete, uninterrupted 30-minute meal period within the first five hours of work, and that employees’ meal periods were frequently interrupted. Despite this, Defendants allegedly deducted 30 minutes from employees’ time records as purported meal period time, even when a compliant meal period was not provided. Plaintiff also alleges that Defendants failed to authorize and permit duty-free 10-minute rest periods for every four hours worked or major fraction thereof, and that rest periods were either not provided or were interrupted.

14. In addition, the operative complaint alleges that Defendants required Plaintiff and Class Members to use their personal cell phone for work purposes, including communicating with coworkers, scheduling, and responding to work-related calls and text messages, but failed to reimburse employees for the costs associated with that use.

15. Plaintiff further alleges that Defendants failed to provide accurate itemized wage statements because the wage statements did not accurately list, among other things, applicable hourly rates of pay, total hours worked, gross and net wages earned, and premium pay owed for missed meal and rest periods. Finally, the operative complaint alleges that Defendants owe waiting time penalties under Labor Code section 203 because Plaintiff and other separated Class Members had not been paid all wages owed upon separation.

16. On April 2, 2026, the Court entered an Order Granting Preliminary Approval of Class and Representative Action Settlement (“Preliminary Approval Order”). In response to the Court’s comments regarding the scope of the Released Class Claims, the Parties entered into the Amendment The Amendment modifies Section A.30 of the Settlement Agreement to remove references to Labor Code sections 1174, and 1174.5, 12 C.C.R. § 11040, 8 C.C.R. § 11060, and claims under “the California common law.” The Amendment further modifies Section C.41 of the Settlement Agreement to reference Code of Civil Procedure section 664.6 regarding the Court’s continuing jurisdiction.

17. The Parties met and conferred regarding whether a Spanish translation of the Class Notice was necessary. Defense counsel represented that a Spanish translation was not necessary for Class Members to understand the Class Notice or exercise their rights. Accordingly, the Class Notice was disseminated in English only.

CY PRES RECIPIENT

18. Legal Aid at work in the designated *cy pres* recipient. Legal Aid at Work’s mission directly aligns with the employment related claims asserted in the Action and provides a benefit to California workers, including Class Members residing in Ventura County. Legal Aid at Work is a non-profit organization that provides free legal services to workers in California and assists workers in understanding and asserting their workplace rights. Among other services, its Workers’ Rights Clinic provides low-income and unemployed workers with free, confidential information regarding their workplace rights under California law, and Legal Aid at Work maintains helplines and self-help materials accessible to workers throughout the State. Because Legal Aid at Work’s services are available to California workers generally, and are not limited to any particular county, Class Members residing in Ventura County may access and benefit from those services.

19. I do not have any relationship with and am not affiliated with the *cy pres* beneficiary, Legal Aid At Work.

RELATED MATTERS

20. Defense Counsel has represented that there is one potentially related matter pending in Los Angeles Superior Court: *Silverstein v. Ascensions Treatment Center LLC*, LASC Case No.

1 24STCV30098. *Silverstein* includes a class claim for alleged violation of Labor Code section 2802
2 and was filed on behalf of all employees. However, Defense counsel has advised that *Silverstein*
3 is proceeding to mediation on an individual basis, and the plaintiff did not file a motion for class
4 certification or stipulate to extend the deadline to do so. Accordingly, the Parties do not believe
5 *Silverstein* will affect the fairness, reasonableness, or adequacy of the Settlement, or otherwise
6 present any impediment to final approval.

7 **ATTORNEYS' FEES & COSTS**

8 21. Class Counsel has a great deal of experience in wage and hour class action
9 litigation. Diversity Law Group has been approved as class counsel in a number of wage and hour
10 class actions and have extensive litigation experience.

11 22. My qualifications are as follows: I was the 2003 recipient of the Spelman
12 Presidential Scholarship to Emory University School of Law. During law school, I was a summer
13 associate at the law firm of Sonnenschein, Nath and Rosenthal, and clerked with the Atlanta office
14 of the Equal Employment Opportunity Commission. I received my J.D. from Emory University in
15 2006 and was admitted to the California Bar in December 2006. Following law school, I was an
16 associate at Sonnenschein from September 2006 to May 2009.

17 23. Since 2009, my primary area of practice has been employment litigation. I have
18 practiced law at two preeminent employment defense firms. From May 2009 to June 2011, I was
19 an associate at Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I was also an associate, and then
20 senior associate, in the labor and employment practice group of Seyfarth Shaw, LLP from June
21 2011 to May 2016. At both Ogletree and Seyfarth, I represented a wide array of fortune 500
22 companies in employment litigation in both state and federal courts, as well as before government
23 agencies, including the California Department of Labor. My practice included the defense of single
24 plaintiff and multi-plaintiff lawsuits involving claims under the California Fair Employment and
25 Housing Act, the California Labor Code and the Fair Labor Standards Act. I also handled a number
26 of wage and hour class actions.

27 24. While at Ogletree and Seyfarth, I served as the lead associate on a number of wage
28 and hour class actions, including *Martha Cardenas v. Gold's Gym*, Los Angeles County Superior

1 Court Case No. BC445112; *Nathaniel Werner v. Crown Equipment Corporation*, Los Angeles
2 County Superior Court Case No. BC439428; *Christopher Williams v. Allstate Insurance Co.*, Los
3 Angeles County Superior Court Case No. BC382577; *Hwang v. Caltech*, Los Angeles County
4 Superior Court Case No. BC464894; *Melissa Roberts v. Zale Delaware, Inc.*, Los Angeles
5 Superior Court Case No. BC523610; *Michael Oliver v. Konica Minolta Business Solutions U.S.A.,*
6 *Inc.*, Santa Clara County Superior Court Case No. 114-CV-263183; *Tessa Hodge v. Zale*
7 *Delaware, Inc., d/b/a Piercing Pagoda*, San Bernardino Superior Court Case No CIVVS1301632;
8 *Warren v. Paychex, Inc.*, N.D. Cal. Case No. 3:10-cv-02006; *Tapia v. Zale Delaware Inc. et al*,
9 S.D. Cal. Case No. 3:13-cv-01565; and *Benjamin Burgess et al v. Tesoro Refining and Marketing*
10 *Company et al*, C.D. Cal. Case No. 2:10-cv-05870.

11 25. I also second chaired two jury trials where I represented the prevailing defendant.
12 Both cases involved employees who brought claims against their former employers pursuant to
13 the Fair Employment & Housing Act. The cases are: *Jeff Cowell v. Eaton Aerospace LLC et al*,
14 Los Angeles County Superior Court Case No. BC401543; and *Richard Gulden v. Pratt & Whitney*
15 *Rocketdyne Inc. et al.*, Los Angeles County Superior Court Case No. BC468909.

16 26. In June 2016, I joined Diversity Law Group, P.C. where I spend most of my time
17 handling employment cases. I primarily represent employees.

18 27. I have been approved as class counsel in numerous wage/hour class actions that
19 have been granted class certification and final approval, including: *Antonio Becerra-Mata v. PSC*
20 *Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030; *Kosal So*
21 *v. Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior Court Case No.
22 BC608609; *Sarah Rodriguez v. Manpower, Inc.*, Santa Clara County Superior Court Case No. 1-
23 16-CV-294904; *Shannon Sanchez v. American Para Professional Systems, Inc.*, Santa Clara
24 County Superior Court Case No. 17CV306751; *Foaad Hanna v. Equinix, LLC*, Santa Clara County
25 Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County
26 Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*,
27 Santa Cruz Superior Court Case No. 18CV00191; *Michael Randolph v. Pacific Racing*
28 *Association*, Alameda County Superior Court Case No. RG18908139; *Cody Wirbick v. Sundt*

1 *Construction, Inc.*, U.S. District Court for the Eastern District of California Case No. 2:19-cv-
2 02067-MCE-CKD; *Jose Vasquez Ruiz v. Perdue Foods, LLC*, Sonoma County Superior Court
3 Case No. SCV 264649; *Delmer Wood III v. Reeve Trucking Company Inc.*, San Joaquin Superior
4 Court Case No. STK-CV-UOE-2018-0004414; *Eric Chavez v. Converse, Inc.*, U.S. District Court
5 for the Northern District of California Case No. 15-cv-03746-NC; *Jharett Siron v. Raypak, Inc.*,
6 Ventura County Superior Court Case No. 56-2019-00527959-CU-OE-VTA; *Prexxie Pascual and*
7 *Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No. 19CV345211;
8 and *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case No. 19CV341582.

9 28. I was lead trial counsel on two bench trials, in which the plaintiffs were the
10 prevailing party. The cases are: *Esteban Palomino v. Northrop Grumman Systems Corporation*,
11 Santa Clara County Superior Court Case No. 19CV345534; and *Jose Delgado v. Taylor Farms*
12 *California, Inc.*, Monterey County Superior Court Case No. 18CV001381.

13 29. To date, I have incurred approximately 44.60 hours in connection with the litigation
14 of this lawsuit. Attached hereto as **Exhibit C** is a summary of the hours I have incurred to date.

15 30. My hourly rate in class and representative actions is \$800. Accordingly, my total
16 lodestar is estimated to be approximately \$35,680, calculated as 44.60 hours multiplied by \$800.
17 I have been approved at an hourly rate of \$800 in the matters of *Robert Jordan v. Mondelez Global*,
18 *LLC*, San Bernardino County Superior Court Case No. CIVSB2202758; *Alexis Tristan v. American*
19 *Homes 4 Rent, L.P.*, Los Angeles County Superior Court Case No. 23STCV17006; and *Jose*
20 *Valencia v. Sentinel Transportation, LLC*, Santa Barbara Superior Court Case No. 22CV00951; *In*
21 *re Humano Wage and Hour Cases*, Judicial Council Coordination Proceeding Case No. 5240. I
22 was also previously approved at an hourly rate of \$700.00 in a number of matters, including: *Foaad*
23 *Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia Harris*
24 *v. 24 Seven LLC*, Los Angeles County Superior Court Case No. BC720144; *Mary Della Maggiora*
25 *v. Watsonville Community Hospital*, Santa Cruz Superior Court Case No. 18CV00191; *Michael*
26 *Randolph v. Pacific Racing Association*, Alameda County Superior Court Case No. RG18908139;
27 *Gutierrez v. Spa Havens, LP*, San Diego Superior Court Case No. 37-2019-00057065-CU-OE-
28 NC; *Cruzado v. Ontario T, Inc.*, San Bernardino Superior Court Case No. CIVSB2027249; *Ray v.*

1 *C&W Facility Services, Inc.*, San Bernardino Superior Court Case No. CIVSB2101321; *Alvarez*
2 *v. Forterra Building Products*, San Diego Superior Court Case No. 37-2020-00018179-CU-OE-
3 CTL; *Dunn v. Universal Plant Services of California, Inc.*, Solano County Superior Court Case
4 No. FCS056134, *Pulido v. Georgia-Pacific Corrugated III LLC*, Fresno Superior Court Case No.
5 18CECG00265; *In re: FPI Management Wage and Hour Cases*, Los Angeles Superior Court Case
6 No. JCCP5050; *Delgado v. Kloeckner Metals Corporation*, Los Angeles Superior Court Case No.
7 20STCV22503; *Jackson v. Samuel, Son & Co. (USA) Inc.*, Riverside County Superior Court Case
8 No. CVRI2101679, *Blanton v. Communications Test Design, Inc.*, San Joaquin Superior Court
9 Case No. STK-CV-UOE-2021-0005136; *Diaz v. Acuity Brands Lighting, Inc.*, San Bernardino
10 Superior Court Case No. CIVDS2015583; *Flournoy v. Partners Personnel – Management*
11 *Services, LLC*, Riverside County Superior Court Case No. CVRI2102372; *Idian v. VHSD ES INC.*,
12 San Diego Superior Court Case No. 37-2019-00018927-CU-OE-CTL; *Miller v. Stanbridge*
13 *University*, Orange County Superior Court Case No. 30-2021-01206298-CU-OE-CXC; *Romano*
14 *v. SSA Terminals, LLC*, Los Angeles Superior Court Case No. 20STCV29048; *Wise v. Le Petite*
15 *Academy, Inc.*, San Joaquin Superior Court Case No., STK-CV-UOE-2021-10561; *Chambers v.*
16 *SOMACIS, Inc.*, San Diego Superior Court Case No. 37-2021-00033445-CU-OE-CTL; *Johnson*
17 *v. FS Palo Alto Employment, Inc.*, Santa Clara Superior Court Case No. 21CV389927; *Rodriguez*
18 *v. U.S. Bank National Association*, Los Angeles Superior Court Case No. BC617356; *Moss v.*
19 *Sares Regis Operating Company, L.P.*, Orange County Superior Court Case No. 30-2021-
20 01201041-CU-OE-CXC; and *Rodriguez v. City National Bank*, Los Angeles Superior Court Case
21 No. 20STCV29761.

22 31. At the time the Parties negotiated the Settlement Agreement, I did not have a final
23 tally of the litigation costs incurred to date. As such, the Parties included a maximum amount that
24 could be attributed to costs under the settlement. To date, Diversity Law Group has incurred costs
25 in the amount of \$14,056.57 for litigation related expenses. Attached hereto as **Exhibit D** is a true
26 and correct copy of the cost report.

27 32. Diversity Law Group represented Plaintiff and the putative class on a wholly
28 contingent basis. From the outset, my firm understood that we were embarking on a complex,

1 expensive and lengthy litigation with no guarantee of ever being compensated for the enormous
2 investment of time and money that the case would require.

3 **NOTICE TO THE LWDA**

4 33. On April 2, 2026, my office uploaded the Court's Order Granting Plaintiff's Motion
5 for Preliminary Approval of Class Action Settlement to the LWDA's website. The LWDA has not
6 responded or objected to this settlement. Attached hereto as **Exhibit E** is a true and correct copy
7 of the submission confirmation.

8 34. On July 7, 2026, my office uploaded this Motion and Proposed Order to the
9 LWDA's website. In addition, my office shall submit to the LWDA a copy of the Court's judgment
10 and order approving the Settlement Agreement within ten (10) days after entry of judgment or
11 order. Attached hereto as **Exhibit F** is a true and correct copy of the submission confirmation.

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

14 Executed on this July 7, 2026, at Los Angeles, California.

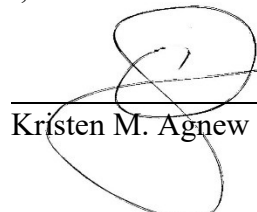
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16 
17 _____
18 Kristen M. Agnew
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EXHIBIT A

Kristen M. Agnew (State Bar No. 247656)
Kwanporn “Mai” Tulyathan (State Bar No. 316704)
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Attorneys for Plaintiff, the Class, and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA

SARAH ROBERTS-COOPER, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

RISE LUXURY REHAB, LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 2024CUOE033989

(Assigned to the Hon. Charmaine H. Buehner,
Dept. J4)

**AMENDMENT TO JOINT STIPULATION OF
CLASS AND REPRESENTATIVE ACTION
SETTLEMENT**

Action Filed: December 4, 2024
Trial Date: Not Set

**AMENDMENT TO JOINT STIPULATION OF CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

Pursuant to Section C-46 of the Joint Stipulation of Class and Representative Action Settlement (“Settlement Agreement” or “Agreement”), Plaintiff Sarah Roberts-Cooper (“Plaintiff”) and Defendants Rise Luxury Rehab, LLC and Ascensions Treatment Center, LLC (together, “Defendants”) (collectively with Plaintiff, the “Parties”) hereby enter into this Amendment to Joint Stipulation of Class and Representative Action Settlement (“Amendment”) to address the matters raised in the Court’s February 1, 2026 Minute Order. Subject to Court approval, the Parties amend the Settlement Agreement as follows:

Section A-30 of the Settlement Agreement shall be amended to now provide:

“Released Class Claims” means all claims pled in the Action or which could have reasonably been alleged based on the factual allegations in the Operative Complaint and the Plaintiff’s PAGA notices to the LWDA, which arose during the Class Period. The Released Class Claims include, but are not limited to claims arising under California Labor Code sections 201, 202, 203, 204, 226, 226.7, 510, 512, 558, 1194, 1197, 1197.1, 2802, and 2698, and the California Business and Professions Code section 17200, et seq. The Released Class Claims include, but are not limited to, all of the following claims for relief: (a) failure to pay all minimum wages and overtime wages due; (b) failure to provide meal periods, or provide premium pay in lieu thereof; (c) failure to permit rest periods, or provide premium pay in lieu thereof; (d) failure to provide accurate itemized wage statements; (e) waiting time penalties; (f) failure to reimburse necessary business-related costs; and (h) unfair business practices. No claims outside the Class Period are released by this Agreement.

Section C-41 of the Settlement Agreement shall be amended to now provide:

Entry of Judgment and Continued Jurisdiction of the Court. Concurrent with the Motion for Final Approval, the Parties shall also jointly seek the entry of Judgment consistent with the terms of this Agreement. After entry of the Judgment, the Court shall have continuing jurisdiction solely for purposes of addressing: (i) the interpretation and enforcement of the terms of the Settlement, (ii) Settlement administration matters, and (iii) such post-Judgment matters as may be

appropriate under court rules or as set forth in this Agreement. The Parties intend this Agreement to be enforceable pursuant to Code of Civil Procedure section 664.6.

APPROVAL AND EXECUTION BY PARTIES
READ CAREFULLY BEFORE SIGNING

DATED: 03 / 26 / 2026

PLAINTIFF SARAH ROBERTS-COOPER



Plaintiff Sarah Roberts-Cooper

DATED: April 7, 2026

DEFENDANT RISE LUXURY REHAB, LLC

Signed by:


Parviz Damavandi
Chief Financial Officer

DATED: April 7, 2026

DEFENDANT ASCENTIONS TREATMENT CENTER, LLC

Signed by:


Parviz Damavandi
Chief Financial Officer

APPROVED AS TO FORM ONLY BY COUNSEL

DATED: March 26, 2026

DIVERSITY LAW GROUP, P.C.



Kristen M. Agnew
Kwanporn "Mai" Tulyathan
Attorneys for Plaintiff and the Class

KACE LAW, APC

DATED: March 26, 2026

Elwina Grigoryan

Elwina Grigoryan
Attorneys for Plaintiff and the Class

CALIFORNIA JUSTICE LAWYERS, LLP

DATED: March 26, 2026

Nick Galadzhyan

Nick Galadzhyan
Attorneys for Plaintiff and the Class

**GORDON REES SCULLY MANSUKHANI,
LLP**

DATED: April 8, 2026

Debra Ellwood Meppen

Debra Ellwood Meppen
Jennifer Jambor-Delgado
Emilie MacLean
Attorneys for Defendants Rise Luxury Rehab, LLC
and Ascensions Treatment Center, LLC

EXHIBIT B

DIVERSITY LAW GROUP

A PROFESSIONAL CORPORATION

515 S. FIGUEROA STREET, SUITE 1250
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 488-6555
FACSIMILE (213) 488-6554

April 21, 2025

VIA ON-LINE FILING

California Labor & Workforce Development Agency
Attn. PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612
PAGA@dir.ca.gov

Re: Sarah Roberts-Cooper v. Rise Luxury Rehab, LLC
LWDA Case No. LWDA-CM-1053040-24

To Whom It May Concern:

My office represents Sarah Roberts-Cooper ("Plaintiff") in her lawsuit against her former employer, Rise Luxury Rehab, LLC ("Defendant" or the "Company"). We are submitting this correspondence as Plaintiff's supplemental written notice under Labor Code § 2699.3 of the claims asserted on behalf of Plaintiff and other aggrieved employees against Defendant.

In addition to the claims alleged in her September 26, 2024 notice, Plaintiff further alleges that Defendant violated Labor Code §§ 226, 1174, and 1174.5, by failing to maintain accurate time and payroll records. In this regard, Defendant failed to maintain accurate payroll records showing the hours Plaintiff and other similarly situated aggrieved employees worked daily and the amount of wages that were paid. In addition, Defendant failed to maintain wage statements for Plaintiff and other similarly situated aggrieved employees for at least three years. Furthermore, Defendant failed to maintain accurate time records showing when Plaintiff and other similarly situated aggrieved employees begin and end each work period, including meal periods.

Please contact me at the above/phone number should you have any questions regarding this matter.

Sincerely,



Mai Tulyathan

cc: Debra Ellwood Meppen, Esq.
Emilie MacLean, Esq.
Jennifer Jambor-Delgado, Esq.

Erika Mejia

From: DIR PAGA Unit <no-reply@formassembly.com>
Sent: Monday, April 21, 2025 5:07 PM
To: Erika Mejia
Subject: Thank you for your Amended PAGA Claim Notice Submission.

04/21/2025 05:06:50 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Amended PAGA Claim

Please note that a PAGA Notice is not a complaint within the meaning of Division 5 (Labor Code §§6300 et seq.). To file a complaint about workplace safety and health hazards with Cal/OSHA, please visit:
<https://www.dir.ca.gov/dosh/complaint.htm>

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

EXHIBIT C

Kristen M. Agnew Time and Task Chart
Sarah Roberts-Cooper v. Rise Luxury Rehab, LLC
Ventura County Superior Court Case No. 2024CUOE033989

Time	Description of Work
3.60	Reviewed intake notes; conducted legal research and analysis regarding potential theories of liability; evaluated likely defenses; and discussed initial case assessment with co-counsel.
1.80	Reviewed and revised PAGA notice and class/PAGA complaint; conferred with co-counsel regarding revisions.
1.10	Met and conferred regarding the March 12, 2025 initial case management conference; reviewed and revised joint complex case management report; and conferred with co-counsel regarding strategy and revisions.
.70	Met and conferred regarding the June 11, 2025 case management conference; reviewed and revised joint complex case management report; and conferred with co-counsel regarding case status and next steps.
1.10	Conferred with co-counsel regarding class certification discovery plan; reviewed and revised requests for production of documents, set one, special interrogatories, set one, and PMK deposition notice.
.80	Reviewed and analyzed sampling of time and payroll records; conferred with co-counsel regarding the records and potential damages issues.
3.10	Conducted legal research and analysis regarding automatic meal period deductions and related penalty claims.
1.30	Conferred with Peregrine Economics (expert) regarding the parameters for analysis of Defendant's payroll production; conferred with co-counsel regarding expert analysis and damages issues.
.90	Reviewed and analyzed initial expert report; conferred with expert regarding questions, assumptions, and missing data; conferred with co-counsel regarding same.
5.50	Conferred with co-counsel regarding mediation strategy; reviewed and revised mediation statement; conferred with co-counsel during full-day mediation.
1.30	Reviewed and revised memorandum of understanding; conferred with co-counsel regarding proposed revisions and comments.
.20	Reviewed and finalized amended PAGA notice.
8.10	Prepared initial draft of Settlement Agreement and class notice; conferred with defense counsel and co-counsel regarding revisions; reviewed and incorporated proposed revisions to Settlement Agreement.
.60	Prepared Plaintiff's statement regarding OSC pertaining to status of filing of motion for preliminary approval.
.30	Conferred with CPT Group and defense counsel regarding installment payments of the Gross Settlement Amount.
2.40	Reviewed and revised initial draft of motion for preliminary approval and supporting declarations; conferred with co-counsel regarding proposed edits and supporting evidence.
2.90	Reviewed and analyzed the Court's tentative order regarding motion for preliminary approval; prepared for and attended hearing on motion for preliminary

Time	Description of Work
	approval; conferred with co-counsel regarding Court ordered revisions to release language.
2.00	Revised class notice and prepared amendment to Settlement Agreement; conferred with defense counsel regarding amendment to Settlement Agreement and revisions to class notice.
.70	Conferred with CPT Group regarding settlement administration, mailing of class notice, and administration budget; reviewed and approved class notice.
6.20	Prepare initial draft of motion for final approval and supporting declarations; conferred with co-counsel regarding revisions and final approval strategy.
44.60	TOTAL

EXHIBIT D



INVOICE

Diversity Law Group

515 South Figueroa Street, Suite 1250,
Los Angeles, California, 90071
lwlee@diversitylaw.com

Invoice # 10508
Invoice Date 06/25/2026
Terms Upon Receipt
Due Date 06/25/2026
PO #

Invoice Total: 14,056.67
Payment Applied: 0.00
Total Due: 14,056.67

Summary By Type

Type	Description	Subtotal	Discount	Tax	Total
Fees & Other Charges		0.00	0.00	0.00	0.00
Billed Time		0.00	0.00	0.00	0.00
Expenses		14,056.67	0.00	0.00	14,056.67
		\$14,056.67	\$0.00	\$0.00	\$14,056.67

Summary By Matter

Matter	Fee and Other Charges	Billed Time	Expenses	Discount	Tax	Total
Roberts-Cooper, Sarah v. Rise	0.00	0.00	14,056.67	0.00	0.00	14,056.67
Luxury Rehab - CA						
	\$0.00	\$0.00	\$14,056.67	\$0.00	\$0.00	\$14,056.67

Subtotal: \$14,056.67
Discount: \$0.00
Subtotal after Discount:\$14,056.67
Taxable Subtotal: \$14,056.67
Tax: \$0.00
Total: \$14,056.67
Payment Applied: \$0.00
Total Due: \$14,056.67

Notes



INVOICE

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Terms & Conditions



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Due Date 06/25/2026
PO #

Summary- Roberts-Cooper, Sarah v. Rise Luxury Rehab - CA (18112.001)

Type	Description	Amount
Fees & Other Charges		0.00
Billed Time		0.00
Expenses		14,056.67

Subtotal: \$14,056.67
Discount: \$0.00
Subtotal after Discount:\$14,056.67
Taxable Subtotal: \$14,056.67
Tax: \$0.00
Total: \$14,056.67

Details - Roberts-Cooper, Sarah v. Rise Luxury Rehab - CA (18112.001)

Expenses

Date	Category	Expense Code	Description	Amount (\$)
09/26/2024		Court fees	LWDA	75.00
09/30/2024		Photocopies	Photocopies	0.50
09/30/2024		Postage	Postage	9.64
10/31/2024		Photocopies	Photocopies	1.00
10/31/2024		Postage	Postage	9.69
12/04/2024		Court fees	Ventura EFiling - ComplaintVentura EFiling - Complaint	1,481.21
12/27/2024	Attorney Service		ACE - Complaint Service	109.26
01/13/2025	Court Fees		ACE E Filing - POS of Summons	17.16
03/06/2025	Court Fees		ACE E Filing - Notice of Remote Appearance (Filing ID 11746839)	17.05
03/07/2025	Court Fees		ACE E Filing - CMS (Filing ID 11755837)	17.05
06/06/2025	Court Fees		ACE EFiling - Notice of Remote Appearance (Filing ID 12290420)	17.05
06/06/2025	Court Fees		ACE EFiling - Status Report (Filing ID 12291210)	17.05
06/17/2025	E121 Arbitrators/mediators		Signature Resolution Mediation	7,750.00

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Invoice #

10508

Invoice Date

06/25/2026

Terms

Upon Receipt

Due Date

06/25/2026

PO #

Date	Category	Expense Code	Description	Amount (\$)
07/16/2025	Court Fees		ACE EFiling - CMS (Filing ID 12519949)	17.05
07/22/2025	Court Fees		ACE EFiling - Status Report (Filing ID 12554883)	17.05
07/23/2025	Expert Fees		Peregrine Economics LLC	4,123.75
07/29/2025	Court Fees		ACE EFiling - Notice of Remote Appearance (Filing ID 12590880)	17.05
08/31/2025	Photocopies		Photocopies	0.50
08/31/2025	Postage and delivery		Postage	10.44
09/02/2025	Court Fees		ACE EFiling - Joint Stip to file FAC (Filing ID 12802505)	37.65
09/17/2025	Court Fees		ACE EFiling - FAC (Filing ID 12895202)	17.05
09/29/2025	Court Fees		ACE EFiling - Joint Status Report (Filing ID 12966387)	17.05
10/14/2025	Court Fees		ACE EFiling - Notice of Remote Appearance (Filing ID: 13063312 Envelope No: 25VN00095542)	17.05
10/14/2025	Court Fees		ACE EFiling - Statement re OSC (Filing ID: 13069729 Envelope No: 25VN00095960)	17.05
11/12/2025	Court Fees		ACE EFiling - MPA (Filing ID: 13257811 Envelope No: 25VN00107189)	79.01
02/09/2026	Court Fees		ACE EFiling - Notice of Remote Appearance (Filing ID: 13794583 Envelope No: 26VN00137527)	17.06
03/18/2026	Court Fees		ACE EFiling - Amended Prop Order Granting MPA (Filing ID: 14042964 Envelope No: 26VN00151845)	17.06
03/27/2026	Court Fees		ACE EFiling - Amended Prop Order re MPA (Filing ID: 14110995 Envelope No: 26VN00155741)	17.06
04/02/2026	Court Fees		ACE EFiling - NOE (Filing ID: 14152219 Envelope No: 26VN00157967)	17.06
07/07/2026	Court Fees		WIP - MFA Est Fees	79.01
07/07/2026	Court Fees		WIP - Notice of Remote Appearance Est Fees	17.06
Subtotal:				\$14,056.67
Total:				\$14,056.67

EXHIBIT E



Outlook

Thank you for your Court Order or Judgment Submission

From no-reply@formassembly.com <no-reply@formassembly.com>

Date Thu 4/2/2026 12:45 PM

To Olympia Pena <olympia@diversitylaw.com>

04/02/2026 12:45:37 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Court Order or Judgment

On 04/02/2026 12:45:37 PM your Court Order or Judgment was successfully processed for case number LWDA-CM-1053040-24

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: [http://labor.ca.gov/Private Attorneys General Act.htm](http://labor.ca.gov/Private_Attorneys_General_Act.htm)

EXHIBIT F