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7 Attorneys for Plaintiff
Samantha LaFrance and the Putative Class
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SANTA BARBARA**
11

12 SAMANTHA LAFRANCE, individually, and
on behalf of other members of the general
13 public similarly situated,

14 Plaintiff,

15 v.

16 BLUE CLOUD PEDIATRIC SURGERY
CENTER, LLC, a Delaware limited liability
17 company; BLUE CLOUD INVESTMENT
HOLDINGS LLC, a Delaware limited
18 liability company; and DOES 1 through 10,
inclusive,

19 Defendants.
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Case No. 24CV05452
Assigned to: Hon. James F. Rigali

**PLAINTIFF SAMANTHA LAFRANCE'S
DECLARATION IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

*[Motion for Preliminary Approval of Class
and Representative Action Settlement,
Declaration of Camron Dowlatsahi, and
(Proposed) Order filed concurrently]*

Date: June 30, 2026
Time: 8:30 a.m.
Dept: SM 2

Complaint Filed: September 26, 2024
Trial Date: None Set

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1 6. I understand that, as a class representative, I assumed fiduciary responsibilities to
2 act in the best interests of the class. I believe I fulfilled those duties and was diligent in
3 representing the interests of the class and aggrieved employees.

4 7. I estimate that I have spent approximately 20-30 hours assisting with this case to
5 date, including time reviewing documents, assisting with the factual investigation, and staying
6 apprised of the case's developments.

7 8. As part of the settlement, I will be releasing all claims I may have against
8 Defendant, which is broader than the release applicable to other class members. In light of this
9 broader release, the time and effort I have invested in the case, the risks I undertook, and my role
10 in helping secure a settlement, I respectfully request a Class Representative Enhancement Payment
11 in the amount of \$5,000, subject to the Court's approval.

12
13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct on 04/21/2026, at Tulare, California.

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17 Samantha LaFrance (Apr 21, 2026 15:59:12 PDT)

18 Samantha LaFrance
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