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Attorneys for Defendant Turf Operations Fresno, Inc.

**SUPERIOR COURT FOR STATE OF CALIFORNIA
COUNTY OF MADERA**

DANIEL DURAN, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

TURF OPERATIONS FRESNO, INC.; and
DOES 1 through 100, inclusive

Defendant.

Case No: MCV095208

**AMENDED DECLARATION OF WAN-
KEUNG CHEN REGARDING SERVICES
PROVIDED BY VALLEY CHILDREN'S
HOSPITAL CHILDREN'S ADVOCACY
CLINIC**

Complaint Filed: December 10, 2024
FAC: February 14, 2025
Trial Date: None Set

I, Wan-Keung Chen, do declare as follows:

1. I am the Medical Director of the Children's Advocacy Center for Valley Children's Healthcare. I am over the age of 18 and make this declaration based on my personal knowledge.

2. The Child Advocacy Center is part of the Clinic Guilds Child Abuse Prevention and Treatment Center Specialties and Services at Valley Children's Healthcare.

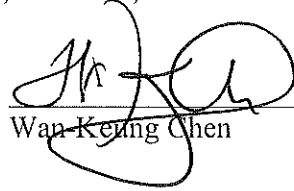
3. Specifically, the Child Advocacy Clinic provides comprehensive medical services to suspected victims of child maltreatment. After the Children are discharged, they are followed by pediatric child abuse specialists to monitor physical recovery, address psychosocial needs and

1 provide referrals to outside agencies.

2 4. Neither Party in this action, nor their attorneys of record, have any financial
3 connection or involvement with the Clinic or hospital.

4 5. Valley Children's Hospital has previously been named as a Cy Pres recipient in the
5 following class action cases: *Adalberto Castro Zavala, et al. v. Grimmus Cattle Company, Inc., et*
6 *al.*, Tulare County Superior Court, Case No. VCU320634; *Juan Matias Jr. v. Joseph Crown*
7 *Construction and Development, Inc., et al.*, Fresno County Superior Court, Case No.
8 25CECG04837; and *Reyes Salado-Gomez v. The Gary and Donna de Graaf Family Trust, et al.*,
9 Tulare County Superior Court, Case No. VCU297485.

10 I declare under penalty of perjury under the laws of the State of California that the foregoing
11 is true and correct. Executed on September 9 2026, at Fresno, California.

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14 Wan-Keung Chen
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