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Attorneys for Plaintiff

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

DORETHA JACKSON, on behalf of herself and
on behalf of all persons similarly situated,

Plaintiffs,

vs.

WHITE FIR HOLDINGS, LLC d/b/a MID-
TOWN OAKS POST-ACUTE, a Delaware
Limited Liability Company; PLUM
HEALTHCARE FOUNDATION, a California
Corporation; PLUM HEALTHCARE GROUP,
LLC, a California Limited Liability Company; GI
SIDE FUND PLUM CORP., a Delaware
Corporation; CALIFORNIA OPCO SUB, LLC, a
Delaware Limited Liability Company; and DOES
1-50, Inclusive.

Defendants.

CASE NO. 34-2021-00301656

**DECLARATION OF LISA PETERSON,
ESQ., IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL
OF CLASS AND PAGA ACTION
SETTLEMENT**

Hearing Date: April 28, 2023
Hearing Time: 9:00am
Department: 28

Trial Date: Not Set
Action Filed: May 27, 2021

Reservation No. 2712082

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I, Lisa Peterson, hereby declare and state as follows:

2. On March 23, 2023, I reached out to Defendant’s retained third-party data analyst to obtain updated class data as follows: (1) number of total Class Members; (2) total workweeks from May 27, 2017 to January 30, 2023; and (3) total workweeks from May 27, 2017 to March 23, 2023. “Class Members” follows the definition as defined in the Settlement and Release Agreement.

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

Executed on March 26th, 2023, at Irvine, California.

Lisa Peterson