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ZAKAY LAW GROUP, APLC

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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

TAMIKA R. THOMAS, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

CENTER FOR ELDERS' INDEPENDENCE,
a California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 22CV024221

**SUPPLEMENTAL DECLARATION OF
SHANI O. ZAKAY, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: January 30, 2024

Time: 1:30 p.m.

Reservation ID: 628376307502

Judge: Hon. Noël Wise

Dept.: 21

1 I, SHANI O. ZAKAY, declare as follows:

2 1. I am the managing partner of the law firm of Zakay Law Group, APLC, co- counsel of
3 record for Plaintiffs in this matter. As such, I am fully familiar with the facts, pleadings and history of
4 the matter. The following facts are within my own personal knowledge, and if called as a witness, I
5 could testify competently to the matters stated herein.

6 2. This supplemental declaration is being submitted in support of Plaintiff's motion for
7 Preliminary Approval of Class and PAGA Action Settlement.

8 3. The Parties have revised the Agreement to remove the Community Law Project ("CLP")
9 as the proposed beneficiary to avoid the appearance of impropriety. The Parties have instead agreed to
10 name the Legal Assistance for Seniors, Inc. ("LAS") as the cy pres beneficiary.

11 4. Neither I, nor any member or employee of my firm, have any interest or involvement in
12 the governance or work of LAS.

13 I declare under penalty of perjury under the laws of the State of California that the foregoing is
14 true and correct. Executed this 22nd day of January 2024, at San Diego, California.

15
16 By:  _____

17 Shani O. Zakay
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