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

PATRICIA CUELLAR and MICHELLE LEE,
as individuals and on behalf of all others
similarly situated,

Plaintiffs,

v.

AVEANNA HEALTHCARE AS, LLC, a
Delaware Limited Liability Company;
PREMIER HEALTHCARE SERVICES, LLC,
a California Limited Liability Company; and
DOES 1 through 100,

Defendants.

Case No. 56-2021-00556492-CU-OE-VTA

*[Assigned for all purposes to the Hon. Ronda J.
McKaig, Dept. 41]*

**DECLARATION OF PATRICIA
CUELLAR IN SUPPORT OF MOTION
FOR SETTLEMENT APPROVAL OF
CLAIMS BROUGHT UNDER THE
PRIVATE ATTORNEYS GENERAL ACT,
REASONABLE ATTORNEYS' FEES AND
COSTS, AND ENHANCEMENT AWARDS**

Date: November 8, 2022
Time: 8:20 a.m.
Dept.: 41

Action Filed: July 23, 2021
Trial Date: None Set

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I, Patricia Cuellar, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I was hired by Aveanna Healthcare AS, LLC (“Aveanna”) as a non-exempt nurse in 2018. I have been out on a medical leave of absence since December 6, 2020, with the exception of working one week in April 2021 on modified duty. My job duties consist of providing in-home health care services for children with disabilities.

3. During my employment, I was always on duty during my shifts and was never relieved of my duties in order to take a meal or rest period. I also received wage statements that listed the incorrect number of hours I worked, or failed to include the correct (or any) rates of pay.

4. When I filed this lawsuit, I understood that it had the chance to benefit other workers by helping them recover penalties owed to them. I knew there were risks associated with filing a lawsuit, but I accepted the risks because I wanted Aveanna to comply with the law. Even though I understood that this lawsuit would be a public record, I accepted that burden for the benefit of Aveanna's other workers.

5. I have been actively involved in this case since before it was filed. Among other things, I gathered documents and provided them to my attorneys, and had numerous discussions with my attorneys regarding the lawsuit and case strategy, Aveanna's policies and practices, and my work experiences at Aveanna. I estimate that I have spent approximately 10 hours on these activities.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on 10/22, 2022 at Fullerton, California.

Patricia Cuellar (Oct 11, 2022 14:51 PDT)

Patricia Cuellar