

1 Yosef Peretz (SBN 209288)
2 Shane Howarter (SBN 311970)
3 PERETZ & ASSOCIATES
4 22 Battery Street, Suite 200
5 San Francisco, CA 94111
6 Tel: 415.732.3777
7 Fax: 415.732.3791
8 yperetz@peretzlaw.com
9 showarter@peretzlaw.com

7 Martin M. Horowitz (SBN 79073)
8 Stephanie Rubinoff (SBN 98229)
9 HOROWITZ & RUBINOFF
10 1440 Broadway, Suite 607
11 Oakland, CA 94612
12 Tel: 510.444.7717
13 mhorowitz@h-rlegal.com
14 srubinoff@h-rlegal.com

12 Attorneys for Named Plaintiffs IRENE CLINE, LYNN CHO,
13 DESIREE PACHECO, and ITZEL MARLENE DIAZ

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF ALAMEDA COUNTY**

16 IRENE CLINE, LYNN CHO, DESIREE
17 PACHECO, and ITZEL MARLENE DIAZ,
18 individually, on behalf of all other similarly
19 situated persons, on behalf of the
20 CALIFORNIA LABOR AND
21 WORKFORCE DEVELOPMENT
22 AGENCY, and on behalf of the STATE OF
23 CALIFORNIA,

21 Plaintiffs,

22 v.

24 SI SE PUEDE BEHAVIORAL, INC. a.k.a.
25 SOCIALLY SIGNIFICANT
26 PROGRAMMING FOR BEHAVIORS,
27 INC., a California corporation; FELICIA
28 LOPEZ, an individual; and DOES 1-20,

27 Defendants.

Case No. RG18911378

**SUPPLEMENTAL DECLARATION OF
YOSEF PERETZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

ASSIGNED FOR ALL PURPOSES TO
JUDGE WINIFRED Y. SMITH
DEPARTMENT 21

Date: August 13, 2021

Time: 10:00 a.m.

Reservation Nos.: R-2276695

Complaint Filed: July 2, 2018


Trial Date: None set

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I, Yosef Peretz, declare as follows:

1. I am an attorney duly licensed to practice before the Courts of the State of California.
2. I am the principal at Peretz & Associates and attorney of record for Plaintiffs IRENE CLINE (“Cline”), LYNN CHO (“Cho”), DESIREE PACHECO (“Pacheco”), and ITZEL MARLENE DIAZ (“Diaz”) (collectively, “Plaintiffs”) in this case. I have personal knowledge of the matters set forth herein and if called upon to testify, I could and would do so competently.
3. This supplemental declaration is submitted in support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement. Plaintiffs submit this supplemental declaration in order to update the Court regarding the SSPBI bankruptcy case.
4. As indicated in Plaintiffs’ Motion, on June 24, 2021, the SSPBI bankruptcy trustee filed his Final Report with the bankruptcy court which included a proposed payment of \$140,250.21 to Plaintiffs and the putative class. The final hearing in the bankruptcy case occurred on July 23, 2021, wherein the bankruptcy court confirmed that the amount of the proposed payment to the putative class from SSPBI’s estate will be \$140,250.21.
5. Therefore, as indicated in Plaintiffs’ Motion, the total amount of the proposed class action settlement will be \$170,250.21, which is comprised of the above-stated amount from SSPBI’s estate and an additional \$30,000 from Defendant Felicia Lopez.
6. On July 28, 2021, Plaintiffs’ counsel received a check from SSPBI’s bankruptcy trustee in the amount of \$140,250.21, which has been placed in my firm’s client trust account pending the Court’s approval of the class action settlement in this matter.

I declare under penalty of the laws of the state of California that the foregoing is true and correct and that this declaration was executed on this day on 29 July 2021, in San Francisco, California.



Yosef Peretz