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26 Attorneys for Plaintiffs and the Class

27 UNITED STATES DISTRICT COURT  
28 CENTRAL DISTRICT OF CALIFORNIA

18 Audrey Heredia as successor-in-interest  
19 to the Estate of Carlos Heredia; Amy  
20 Fearn as successor-in-interest to the  
21 Estate of Edith Zack; and Elise Ganz,  
22 as successor-in-interest to the Estate of  
23 Helen Ganz; on their own behalves and  
24 on behalf of others similarly situated,

25 Plaintiffs,

26 vs.

27 Sunrise Senior Living, LLC; Sunrise  
28 Senior Living Management, Inc.; and  
Does 2 - 100,

Defendants.

CASE NO. 8:18-cv-1974-JLS (JDEx)

**SUPPLEMENTAL DECLARATION  
OF AMY FEARN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
FINAL CLASS SETTLEMENT  
APPROVAL**

Date: November 8, 2024  
Time: 10:30 a.m.  
Place: Courtroom 8A, 8th Fl.  
Judge: Hon. Josephine L. Staton

1 I, Amy Fearn, hereby declare,

2 1. If called to testify as to the information contained herein, I would and  
3 could competently do so as stated below. This supplemental declaration is based on  
4 my own personal knowledge, except as to those matters about which are stated upon  
5 information and belief.

6 2. I am the daughter of Plaintiff and decedent Edith Zack, who went by  
7 "Dede," and was 89 years old when she passed. My mother was a resident at Sunrise  
8 of San Mateo from approximately September 29, 2016 to November 2, 2016. I served  
9 as a class representative in this case as the successor-in-interest to the Estate of Edith  
10 Zack.

11 3. I previously submitted a declaration supporting the preliminary  
12 approval of the settlement of this matter on April 17, 2024. ECF 614-6.

13 4. I understand that after my declaration was submitted, the Parties agreed  
14 to an Addendum to the Settlement Stipulation which revised the settlement  
15 distribution plan to include consideration of the duration of each class member's  
16 residency at a Sunrise facility when calculating the Residency Days Payment.

17 5. I understand that the Court has granted preliminary approval for the  
18 Parties' settlement pursuant to Orders dated July 26, 2024 and August 7, 2024. ECF  
19 626, 628.

20 6. Having reviewed the Addendum to the Settlement Stipulation and the  
21 Court's preliminary approval orders, I reaffirm my support for the settlement.

22 Executed on October 29, 2024 at Burlingame, California.

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28

DocuSigned by:  
  
AMY FEARN