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26 Attorneys for Plaintiffs and the Class

27 UNITED STATES DISTRICT COURT
28 CENTRAL DISTRICT OF CALIFORNIA

29 Audrey Heredia as successor-in-interest
30 to the Estate of Carlos Heredia; Amy
31 Fearn as successor-in-interest to the
32 Estate of Edith Zack; and Elise Ganz,
33 as successor-in-interest to the Estate of
34 Helen Ganz; on their own behalves and
35 on behalf of others similarly situated,

36 Plaintiffs,

37 vs.

38 Sunrise Senior Living, LLC; Sunrise
39 Senior Living Management, Inc.; and
40 Does 2 - 100,

41 Defendants.

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

**SUPPLEMENTAL DECLARATION
OF ELISE GANZ 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, Elise Ganz, 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 Helen Ganz, who
7 was 97 years old when she passed in 2022. My mother was a resident at Sunrise of
8 San Rafael from approximately September 30, 2016 to June 16, 2019. I served as a
9 class representative in this case as my mother's Guardian ad Litem and as the
10 successor-in-interest to the Estate of Helen Ganz.

11 3. I previously submitted a declaration supporting the preliminary
12 approval of the settlement of this matter on April 17, 2024. ECF 614-7.

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 San Rafael, California.

23
24
25 DocuSigned by:
26 *Elise Ganz*
27 ELISE GANZ
28