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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON**

14 **Richard Cerenzia and Richard**
15 **Cerenzia, individually and on**
16 **behalf of others similarly situated,**

Plaintiffs,

v.

18 **Emergency Physician Services, P.S.**
19 **Providence Holy Family Hospital,**
20 **Sacred Heart Medical Center, and**
21 **Providence Health and Services,**

Defendants.

Case No.: 2:18-cv-00062-SMJ

**DECLARATION OF RICHARD
CERENZIA IN SUPPORT OF:**

**(1) FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

**(2) AWARD OF ATTORNEYS'
FEES, COSTS AND SERVICE
AWARDS;**

DATE: February 9, 2021

TIME: 1:30 p.m.

CRTRM: 755

JUDGE: Hon. Salvador J. Mendoza



DECLARATION OF RICHARD CERENZIA

I, Richard Cerenzia hereby declare under penalty of perjury that the following is true and correct:

1. I am one of the named Plaintiffs in this above captioned class action. If called as a witness, I would competently testify to the matters herein from personal knowledge. I am filing this declaration in support of Plaintiffs’ Motion for Attorneys Fees, Costs, and Service Awards and Motion for Final Approval of Class Action Settlement.
2. I have kept updated with the progress of this litigation through my attorneys.
3. I am willing to serve as a class representative and have been since I first joined this lawsuit.
4. I understand my tasks as a class representative and I have participated throughout this litigation in the belief I was helping all other persons similarly situated.
5. Specifically, I have served as an adequate Class Representative by reviewing the Settlement Agreement and submitting declarations in support of the motion for preliminary approval and the present motion; and I support final approval of the proposed Settlement.
6. I believe that this settlement is fair and reasonable; and among other things, the Settlement will avoid costly and time-consuming litigation and the need for trial.
7. In considering the Settlement, I carefully balanced the risks of continuing to engage in protracted and contentious litigation against the benefits to the Settlement Class, including the stipulated change in policies, and believe that the injunctive relief settlement is in the best interests of the Settlement Class Members.
8. I reviewed the Complaint in this case before it was filed, assisted counsel



1 with responding to discovery requests, attended two settlement conferences,
2 reviewed preliminary and final approval documents, and helped prepare a
3 declaration in support of this motion. I have spent hours fulfilling my class
4 representative duties for this case.

5 9. I am unaware of any legal differences in my status as a Class Member from
6 the other Class Members, nor of any unique factual issues pertaining to such
7 representative status which must be litigated. To my knowledge, I have no
8 conflict with the other Class Members.

9 10. The claims which I have asserted in the Complaint seem to be the same as
10 the claims of the other class members, and my claims relate to the same
11 issues of law and fact as the other class claims.

12 11. I understand the obligations as serving as class representative and have
13 continued to adequately represent the interests of the putative class since the
14 preliminary approval motion.

15 12. Neither myself, nor anyone in my family have any financial interest in this
16 matter besides what may eventually be awarded by this Court. I further avow
17 to put the Class Member's interest ahead of my own.

18 13. I support my attorneys' requests to be compensated for their fees and costs.


19 14. I respectfully request a \$2,500 incentive award for my participation in this
20 case.

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1 I declare under penalty of perjury under the laws of the State of Washington
2 that the foregoing is true and correct and that this declaration was signed in the
3 State of Washington.

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5 Dated: 11/06/2020

Respectfully submitted,

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8 _____
9 Richard Cerenzia
10 Plaintiff

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