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4 **IN THE CIRCUIT COURT FOR THE STATE OF OREGON**  
5 **FOR THE COUNTY OF JACKSON**

6 **RENEE MAZA, JODI REAL, AND STEVE**  
7 **PRICE**, individually and on behalf of all  
8 similarly situated,

9 **Plaintiffs,**

10 v.

11 **WATERFORD OPERATIONS, LLC AND**  
12 **COOS BAY REHABILITATION, LLC**, a  
13 domestic limited liability company,

14 **Defendants.**

Case No. 14CV03147

**SUPPLEMENTAL  
JUDGMENT**

15 The Court having conducted a bench trial beginning on January 17, 2023 and entered a  
16 General Judgment on May 22, 2023, and having considered Plaintiffs' Statement of Costs and  
17 Attorney Fees, Motion for Incentive Awards to the Plaintiffs, and supporting briefing and  
18 documents, having received stipulation from Defendants via their counsel William Gaar to the  
19 amounts herein, upon stipulation Plaintiffs waive their request for Findings and Conclusions,  
20 and having reviewed the file, being fully advised herein, therefore expressly direct the entry of  
21 a supplemental judgment.

22 Pursuant to ORCP 32 L, the classes are defined as:

23 **Meal Period Class:** Hourly employees who were required to take a full 30 minute  
24 meal period, and who on one or more occasions received less than the 30 minutes due  
25 to returning to work early.

26 **Point Click Care Class ("PCC"):** Hourly employees whose work time was recorded  
in Kronos, Defendants' electronic time keeping system, and who worked off-the-clock

1 using Point Click Care without compensation.  
2 Further as required by ORCP 32L, the following individuals have requested exclusion and are  
3 not bound by this judgment: Carolyn Barnhill, Debra Dyas, Dorinda Engel, Sunflower  
4 Folkins, Trevor Folkins, James F. Johnson, Christy R. Kruse, William Macy, Ellen J. Marsh,  
5 Rebecca Roberts, Carolyn Schoenfelder, Kathryn G. Stewart, and Arleta Walker.

6 IT IS HEREBY ORDERED AND ADJUDGED that Plaintiffs and the class members  
7 listed in exhibits A and B hereto, shall have and recover from Defendants as set forth below:

8 **MONEY AWARD 1**

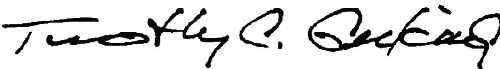
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|----|----|--|--|
| 9  | 1. | JUDGMENT CREDITORS:  | Plaintiffs Renee Maza, Jodi Real and Steve Price   |
| 10 |    |  |  |
| 11 | 2. | JUDGMENT CREDITORS' ATTORNEYS:   | David A. Schuck<br>Karen A. Moore<br>Stephanie J. Brown<br>Schuck Law, LLC<br>208 E 25 <sup>th</sup> Street<br>Vancouver, WA 98663<br>(360) 566-9243 |
| 12 |    |  |  |
| 13 |    |  |  |
| 14 | 3. | JUDGMENT DEBTOR:   | Waterford Operations, LLC<br>aka Avamere at Waterford<br>aka Avamere at Three Fountains<br>760 Spring Street<br>Medford, OR 97504<br>(541) 773-7718  |
| 15 |    |  |  |
| 16 |    |  |  |
| 17 |    |  |  |
| 18 | 4. | JUDGMENT DEBTOR'S ATTORNEYS:   | William Gaar<br>Jillian Pollock<br>Buckley Law, PC<br>5300 Meadows Road, Suite 200<br>Lake Oswego, OR 97035<br>(503) 620-8900                        |
| 19 |    |  |  |
| 20 |    |  |  |
| 21 | 5. | PERSON/PUBLIC BODY OTHER THAN JUDGMENT CREDITOR'S ATTORNEY, KNOWN TO BE ENTITLED TO ANY PORTION OF THE MONEY AWARD | None   |
| 22 |    |  |  |
| 23 |    |  |  |
| 24 | 6. | JUDGMENT AMOUNT:   | previously awarded   |
| 25 | 7. | PREJUDGMENT INTEREST:  | None   |
| 26 | 8. | POST-JUDGMENT INTEREST:  | Simple interest at the rate of 9% per  |

1		annum on all amounts listed items 10, 11,
2		and 12 to begin the day after this
		Supplemental Judgment is entered
3	9	PERIODIC PAYMENT? No
4	10.	COSTS, DISBURSEMENTS AND EXPENSES: \$75,952.43
5	11.	ATTORNEY FEES \$2,190,509.75
6	12.	INCENTIVE AWARDS: \$75,000.00 total, allocated as
7		\$25,000 to each Plaintiff
8		
9		<b>MONEY AWARD 2</b>
10	1.	JUDGMENT CREDITORS: Plaintiffs Renee Maza, Jodi Real and Steve Price
11	2.	JUDGMENT CREDITORS' ATTORNEYS: David A. Schuck Karen A. Moore Stephanie J. Brown Schuck Law, LLC 208 E 25 <sup>th</sup> Street Vancouver, WA 98663 (360) 566-9243
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15	3.	JUDGMENT DEBTOR: Coos Bay Rehabilitation, LLC aka Avamere Rehabilitation of Coos Bay 2625 Koos Bay Blvd Coos Bay, Or 97420 (541) 267-2161
16		
17		
18	4.	JUDGMENT DEBTOR'S ATTORNEYS: William Gaar Jillian Pollock Buckley Law, PC 5300 Meadows Road, Suite 200 Lake Oswego, OR 97035 (503) 620-8900
19		
20		
21	5.	PERSON/PUBLIC BODY OTHER THAN JUDGMENT CREDITOR'S ATTORNEY, KNOWN TO BE ENTITLED TO ANY PORTION OF THE MONEY AWARD None
22		
23		
24	6.	JUDGMENT AMOUNT: previously awarded
25	7.	PREJUDGMENT INTEREST: None
26	8.	POST-JUDGMENT INTEREST: Simple interest at the rate of 9% per annum on all amounts listed items 10, 11,

and 12 to begin the day after this Supplemental Judgment is entered

9	PERIODIC PAYMENT?	No
10	COSTS, DISBURSEMENTS AND EXPENSES:	\$75,952.43
11	ATTORNEY FEES	\$2,190,509.75
12	INCENTIVE AWARDS:	\$75,000.00 total, allocated as \$25,000 to each Plaintiff

6/28/2023 11:34:45 AM



Circuit Court Judge – Judge Timothy C. Gerking

Submitted By:  
 Schuck Law, LLC  
 s/ David A. Schuck  
 David A. Schuck, OSB 993564  
 dschuck@wageclaim.org  
 Karen A. Moore, OSB 040922  
 kmoore@wageclaim.org  
 Stephanie J. Brown, OSB 030019  
 sbrown@wageclaim.org  
 Attorneys for Plaintiffs and Class Members

Buckley Law, PC  
 s/William E. Gaar  
 William E. Gaar, OSB 890464  
 weg@buckley-law.com  
 Jillian Pollock, OSB 072494  
 jp@buckley-law.com  
 Attorneys for Defendants

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**CERTIFICATE OF READINESS – UTCR 5.100**

*Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147*

This proposed order or judgment is ready for judicial signature because each party affected by this order or judgment has approved the order or judgment, as shown by signature on the document being submitted or by written confirmation of approval sent to me.

Dated: June 26, 2023.

s/ Karen A. Moore  
KAREN A. MOORE, OSB 040922  
kmoore@wageclaim.org  
Attorney for Plaintiffs and Class Members

**CERTIFICATE OF SERVICE**

*Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147*

I hereby certify that I caused to be served the foregoing **SUPPLEMENTAL JUDGMENT** upon:

William Gaar  
Jillian Pollock  
Buckley Law, PC  
5300 Meadows Road, Suite 200  
Lake Oswego, OR 97035  
weg@buckley-law.com; jp@buckley-law.com  
Attorneys for Defendants

by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.

DATED: June 26, 2023.

s/ Karen A. Moore  
KAREN A. MOORE, OSB 040922