1		
2		
3		
4	IN THE CIRCUIT COURT FOR T	THE STATE OF OREGON
5	FOR THE COUNTY OF JACKSON	
6	RENEE MAZA, JODI REAL, AND STEVE Case No. 14CV03147	
7	<b>PRICE</b> , individually and on behalf of all similarly situated,	SUPPLEMENTAL
8	Plaintiffs,	JUDGMENT
9	v.	
10	WATERFORD OPERATIONS, LLC AND	
11	<b>COOS BAY REHABILITATION, LLC,</b> a domestic limited liability company,	
12	Defendants.	
13		
14	The Court having conducted a bench trial be	eginning on January 17, 2023 and entered a
15	General Judgment on May 22, 2023, and having cor	nsidered Plaintiffs' Statement of Costs and
16	Attorney Fees, Motion for Incentive Awards to the I	Plaintiffs, and supporting briefing and
17	documents, having received stipulation from Defend	dants via their counsel William Gaar to the
18	amounts herein, upon stipulation Plaintiffs waive th	eir request for Findings and Conclusions,
19	and having reviewed the file, being fully advised he	rein, therefore expressly direct the entry of
20	a supplemental judgment.	
21	Pursuant to ORCP 32 L, the classes are defined	ned as:
22	Meal Period Class: Hourly employees who	were required to take a full 30 minute
23	meal period, and who on one or more occasi	ons received less than the 30 minutes due
24	to returning to work early.	
25	Point Click Care Class ("PCC"): Hourly e	employees whose work time was recorded
26	in Kronos, Defendants' electronic time keep	ing system, and who worked off-the-clock

Page 1 - Supplemental Judgment

1		using Point Click Care without compensatio	n.	
2	Further as required by ORCP 32L, the following individuals have requested exclusion and are			
3	not bo	not bound by this judgment: Carolyn Barnhill, Debra Dyas, Dorinda Engel, Sunflower		
4	Folkin	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 i	listed in exhibits A and B hereto, shall have and recover from Defendants as set forth below:		
8		MONEY AWARD 1		
9	1.	JUDGMENT CREDITORS:	Plaintiffs Renee Maza, Jodi Real and Steve Price	
10	2.	JUDGMENT CREDITORS'	David A. Schuck	
11		ATTORNEYS:	Karen A. Moore Stephanie J. Brown	
12			Schuck Law, LLC 208 E 25 <sup>th</sup> Street	
13			Vancouver, WA 98663 (360) 566-9243	
14	3.	JUDGMENT DEBTOR:	Waterford Operations, LLC	
15			aka Avamere at Waterford aka Avamere at Three Fountains	
16			760 Spring Street Medford, OR 97504	
17			(541) 773-7718	
18	4.	JUDGMENT DEBTOR'S ATTORNEYS:	William Gaar Jillian Pollock	
19			Buckley Law, PC 5300 Meadows Road, Suite 200	
20			Lake Oswego, OR 97035 (503) 620-8900	
21	5.	PERSON/PUBLIC BODY OTHER THAN		
22		JUDGMENT CREDITOR'S ATTORNEY, KNOWN TO BE ENTITLED TO ANY		
23		PORTION OF THE MONEY AWARD		
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	•			

Page 2 - Supplemental Judgment

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 7	12.	INCENTIVE AWARDS:	\$75,000.00 total, allocated as \$25,000 to each Plaintiff
8			
9		MONEY AWA	ARD 2
10	1.	JUDGMENT CREDITORS:	Plaintiffs Renee Maza, Jodi Real and Steve Price
11	2.	JUDGMENT CREDITORS'	David A. Schuck
12		ATTORNEYS:	Karen A. Moore Stephanie J. Brown
13			Schuck Law, LLC 208 E 25 <sup>th</sup> Street
14			Vancouver, WA 98663 (360) 566-9243
15	3.	JUDGMENT DEBTOR:	Coos Bay Rehabilitation, LLC
16			aka Avamere Rehabilitation of Coos Bay 2625 Koos Bay Blvd
17			Coos Bay, Or 97420 (541) 267-2161
18	4.	JUDGMENT DEBTOR'S ATTORNEYS:	William Gaar Jillian Pollock
19			Buckley Law, PC 5300 Meadows Road, Suite 200
20			Lake Oswego, OR 97035 (503) 620-8900
21	5.	DEDCON/DUDI IC DODV OTHED THAN	
22	5.	PERSON/PUBLIC BODY OTHER THAN JUDGMENT CREDITOR'S ATTORNEY, KNOWN TO BE ENTITLED TO ANY	None
23		PORTION OF THE MONEY AWARD	
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,

Page 3 - Supplemental Judgment

1			and 12 to begin the day after this Supplemental Judgment is entered
2	9	PERIODIC PAYMENT?	No
3	10.	COSTS, DISBURSEMENTS	¢75.052.42
4		AND EXPENSES:	\$75,952.43
5	11.	ATTORNEY FEES	\$2,190,509.75
6 7	12.	INCENTIVE AWARDS:	\$75,000.00 total, allocated as \$25,000 to each Plaintiff
8			6/28/2023 11:34:45 AM
9 10			Twothy ?. Orchang
10			Circuit Court Judge – Judge Timothy C. Gerking
12			
13			
14		itted By: k Law, LLC	Buckley Law, PC
			·
15 16	David	<u>id A. Schuck</u> A. Schuck, OSB 993564	<u>s/William E. Gaar</u> William E. Gaar, OSB 890464 wag@bueklay.law.com
10	Karen	ck@wageclaim.org A. Moore, OSB 040922	weg@buckley-law.com Jillian Pollock, OSB 072494
	Stepha	re@wageclaim.org anie J. Brown, OSB 030019	jp@buckley-law.com Attorneys for Defendants
18	sbrown@wageclaim.org Attorneys for Plaintiffs and Class Members		
19 20			
20			
21			
22			
23			
24			
25			
26			

Page 4 - Supplemental Judgment

2       The maintain of, LLC, case no. 14C (V314)         3       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.         5       Dated: June 26, 2023.         6       S/ Karen A. Moore (KAREN A. MOORE, OSB 040922 kmoore @wageclaim.org Attorney for Plaintiffs and Class Members         7       Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147         10       Ihereby certify that I caused to be served the foregoing SUPPLEMENTAL JUDGMENT upon:         11       upon:         12       William Gaar Jillian Pollock         13       Buckley Law, PC 5300 Meadows Road, Suite 200 Lake Oswego, OR 97035 weg @buckley-law.com Attorneys for Defendants         16       by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.         18       DATED: June 26, 2023.         19       DATED: June 26, 2023.         21       KAREN A. MOORE, OSB 040922         23       Staren A. Moore KAREN A. MOORE, OSB 040922	1 2	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	
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.         5       Dated: June 26, 2023.         6       Staren A. Moore KAREN A. MOORE, OSB 040922 kmoore@wageclaim.org Attorney for Plaintiffs and Class Members         8       CERTIFICATE OF SERVICE         9       Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147         10       Ihereby certify that I caused to be served the foregoing SUPPLEMENTAL JUDGMENT upon:         11       William Gaar Jillian Pollock         13       Buckley Law, PC S300 Meadows Road, Suite 200 Lake Oswego, OR 97035 weg@buckley-law.com         14       Lake Oswego, OR 97035 weg@buckley-law.com         15       Attorneys for Defendants         16       by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.         18       DATED: June 26, 2023.         19       DATED: June 26, 2023.         21       Staren A. MOORE, OSB 040922         22       Staren A. MOORE, OSB 040922         23       Staren A. MOORE, OSB 040922			
6       s/ Karen A. Moore KAREN A. MOORE, OSB 040922 kmoore@wageclaim.org Attorney for Plaintiffs and Class Members         8       CERTIFICATE OF SERVICE         9       Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147         10       I hereby certify that I caused to be served the foregoing SUPPLEMENTAL JUDGMENT upon:         12       William Gaar Jillian Pollock         13       Buckley Law, PC 5300 Meadows Road, Suite 200 Lake Oswego, OR 97035 weg@buckley-law.com; jp@buckley-law.com Attorneys for Defendants         16       by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.         18       DATED: June 26, 2023.         21       Si Karen A. Moore KAREN A. MOORE, OSB 040922         23       Si Karen A. Moore         24       Si Karen A. MOORE, OSB 040922		affected by this order or judgment has approved the order or judgment, as shown by signature	
7       Attorney for Plaintiffs and Class Members         8       CERTIFICATE OF SERVICE         9       Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147         10       I hereby certify that I caused to be served the foregoing SUPPLEMENTAL JUDGMENT         11       upon:         12       William Gaar Jillian Pollock         13       Buckley Law, PC 5300 Meadows Road, Suite 200         14       Lake Oswego, OR 97035 weg@buckley-law.com         15       Attorneys for Defendants         16       by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.         18       DATED: June 26, 2023.         19       DATED: June 26, 2023.         21       XAREN A. MOORE, OSB 040922         22       23         23       24         24       25	5	Dated: June 26, 2023.	
7       Attorney for Plaintiffs and Class Members         8       CERTIFICATE OF SERVICE         9       Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147         10       Ihereby certify that I caused to be served the foregoing SUPPLEMENTAL JUDGMENT upon:         12       William Gaar Jillian Pollock         13       Buckley Law, PC 5300 Meadows Road, Suite 200 Lake Oswego, OR 97035 weg@buckley-law.com; jp@buckley-law.com Attorneys for Defendants         16       by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.         18       DATED: June 26, 2023.         21       Staren A. Moore KAREN A. MOORE, OSB 040922         23       Staren A. Moore         24       Staren A. MOORE, OSB 040922	6	<u>s/ Karen A. Moore</u> KAREN A. MOORE, OSB 040922 kmoore@wageclaim.org	
CERTIFICATE OF SERVICE         Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147         Intereby 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.         Marcen A. Moore         KAREN A. MOORE, OSB 040922         Side A. MOORE, OSB 040922	7		
9       Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147         10       I hereby certify that I caused to be served the foregoing SUPPLEMENTAL JUDGMENT upon:         11       william Gaar Jillian Pollock         13       Buckley Law, PC 5300 Meadows Road, Suite 200 Lake Oswego, OR 97035 weg@buckley-law.com Attorneys for Defendants         16       by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.         18       DATED: June 26, 2023.         20 <u>s/ Karen A. Moore</u> KAREN A. MOORE, OSB 040922         21       23         23	8		
11       Ihereby certify that I caused to be served the foregoing SUPPLEMENTAL JUDGMENT         12       William Gaar         13       Buckley Law, PC         5300 Meadows Road, Suite 200         1ake Oswego, OR 97035         weg@buckley-law.com; jp@buckley-law.com         15       Attorneys for Defendants         16       by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR         17       21.100, on June 26, 2023.         18       DATED: June 26, 2023.         19       DATED: June 26, 2023.         20       s/ Karen A. Moore         KAREN A. MOORE, OSB 040922         21       4         23       4         24       4	9	Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay	
<ul> <li>upon: </li> <li>William Gaar Jillian Pollock</li> <li>Buckley Law, PC 5300 Meadows Road, Suite 200 Lake Oswego, OR 97035 weg@buckley-law.com Attorneys for Defendants</li> <li>by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.</li> <li>DATED: June 26, 2023.</li> <li>S/ Karen A. Moore KAREN A. MOORE, OSB 040922</li> <li>Karen A. MOORE, OSB 040922</li> </ul>	10		
<ul> <li>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</li> <li>by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.</li> <li>DATED: June 26, 2023.</li> <li>S/ Karen A. Moore KAREN A. MOORE, OSB 040922</li> <li>KAREN A. MOORE, OSB 040922</li> </ul>	11		
<ul> <li>Buckley Law, PC 5300 Meadows Road, Suite 200 Lake Oswego, OR 97035 weg@buckley-law.com; jp@buckley-law.com Attorneys for Defendants</li> <li>by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.</li> <li>DATED: June 26, 2023.</li> <li>S/ Karen A. Moore KAREN A. MOORE, OSB 040922</li> <li>KAREN A. MOORE, OSB 040922</li> </ul>	12		
<ul> <li>Lake Oswego, OR 97035 weg@buckley-law.com; jp@buckley-law.com Attorneys for Defendants</li> <li>by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.</li> <li>DATED: June 26, 2023.</li> <li>S/ Karen A. Moore KAREN A. MOORE, OSB 040922</li> <li>KAREN A. MOORE, OSB 040922</li> </ul>	13	Buckley Law, PC	
15       Attorneys for Defendants         16       by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.         18       DATED: June 26, 2023.         19       DATED: June 26, 2023.         20 <u>s/ Karen A. Moore KAREN A. MOORE, OSB 040922</u> 21       23         24       25	14	Lake Oswego, OR 97035	
<ul> <li>by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on June 26, 2023.</li> <li>DATED: June 26, 2023.</li> <li><i>S/</i> Karen A. Moore KAREN A. MOORE, OSB 040922</li> <li>Court System A. MOORE, OSB 040922</li> <li>Court System A. MOORE, OSB 040922</li> </ul>	15	weg@buckley-law.com; jp@buckley-law.com Attorneys for Defendants	
<ul> <li>17 21.100, on June 26, 2023.</li> <li>DATED: June 26, 2023.</li> <li>DATED: June 26, 2023.</li> <li>S/ Karen A. Moore KAREN A. MOORE, OSB 040922</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ul>	16		
19       DATED: June 26, 2023.         20 <u>s/ Karen A. Moore</u> 21       KAREN A. MOORE, OSB 040922         22       23         23       24         25       25	17		
20 21 22 23 24 25	18		
21         22         23         24         25	19	DATED: June 26, 2023.	
21         22         23         24         25	20	<u>s/ Karen A. Moore</u> KAREN A. MOORE OSB 040022	
23 24 25	21	KAREN A. WOORE, OSD 040922	
24 25	22		
25	23		
	24		

Page 5 - Supplemental Judgment