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Attorneys for Plaintiff JULIA TORRES in a Representative capacity only, and on behalf of other members of the general public similarly situated

[Additional Counsel listed on next page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF IMPERIAL

JULIA TORRES, JOY OLIVER BANKS,
and JOSE GOMEZ, in a Representative
capacity only, and on behalf of other
members of the general public similarly
situated,

Plaintiff

v.

MANAGEMENT & TRAINING
CORPORATION, a Delaware Corporation;
and DOES 1-10, inclusive

Defendants

CASE NO. ECU003320

**DECLARATION OF JULIA TORRES IN
SUPPORT OF PLAINTIFF'S UNOPPOSED
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: June 23, 2026

Time: 8:30 a.m.

Dept.: 5

Judge: Hon. Jeffrey B. Jones

I, Julia Torres, hereby declare as follows:

Declaration of Julia Torres

1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement.
2. I have personal knowledge of the facts set forth in this declaration and if called to testify as a witness, I could and would do so.
3. To my recollection, I personally met with my Attorneys on at least 3 occasions. Several of those meetings lasted in excess of one hour.
4. During these meetings, I would review and explain numerous documents turned over by Defendants from my employment. I would also explain my (as well as others') role during work. I also helped identify numerous other employees who could support the claims I was making in this lawsuit.
5. I also spoke with my attorneys on the phone on at least 10 other occasions.
6. In total, I estimate that I spent at least 22 hours related to the above mentioned tasks directly working with my attorneys. I also estimate I spent at least another 5 hours of my own time gathering evidence and outlining issues that I later shared with my attorneys.
7. When I decided to move forward with this case, I was counseled by my attorneys of the potential stigma of being a Representative in a "Wage and Hour," dispute, as this is a publicly filed lawsuit.
8. I was also advised when I brought this case that had we lost, I could have been personally liable for paying all of Defendants' costs. I was further advised this could be well into the tens of thousands of dollars on this type of case.
9. Despite these risks I was committed to achieving a settlement that would benefit all employees working for MANAGEMENT & TRAINING CORPORATION.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 29th day of May, 2026.



JULIA TORRES

Title	Declaration Signature Required -Torres 7387
File name	Torres_Decl.pdf
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