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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

VERONICA GONZALEZ, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

PRECISION HOSPITALITY &
DEVELOPMENT, LLC, a California
limited liability company; and DOES 1
through 100,

Defendants.

Case No. 30-2020-01127597-CU-OE-CXC

*[Assigned for all purposes to the Hon. Randall
J. Sherman, Dept. CX105]*

**DECLARATION OF ALMA V.
MONTENEGRO IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SETTLEMENT APPROVAL OF CLAIMS
BROUGHT UNDER THE PRIVATE
ATTORNEYS GENERAL ACT,
REASONABLE ATTORNEYS' FEES AND
COSTS, AND ENHANCEMENT AWARDS**

Date: July 30, 2021
Time: 10:00 a.m.
Dept.: CX105
Reservation: 73562171

Action Filed: January 29, 2020
Trial Date: None Set

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I, Alma V. Montenegro, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named
ffs Veronica Gonzalez and Guadalupe Padilla (“Plaintiffs”) in the above-captioned matter.
member in good standing of the bar of the State of California and am admitted to practice
Court. I have personal knowledge of the facts stated in this declaration and could testify
ently to them if called upon to do so.

2. I am a 2018 graduate of the University of San Diego School of Law, where I was awarded the Faculty Honor Scholarship. During law school I interned for the Southern District of California's United States Attorney's Office and for the San Diego District Attorney's Office in the Prosecution & Training division, among others. After graduating from law school, I worked as a Law Clerk at Lang, Richert and Patch ("LRP"), a full-service law firm in Fresno, California. I was admitted to the California State Bar in December 2018. Since that time, I have worked in the area of employment litigation. Specifically, from September 2018 to August 2020, I worked as an associate at LRP where the vast majority of my work focused on defense and plaintiff-side employment cases in discrimination, harassment, and wage and hour laws. Although exhaustive, the type of work I performed included: conducting client intakes; performing pre-discovery research and analysis; drafting complaints and letters to administrative agencies; attending hearings; corresponding with opposing counsel; drafting and responding to written motions; analyzing payroll and timekeeping records; drafting complaints and mediation briefs; conducting mediations; interviewing witnesses; drafting and responding to demand letters; research and writing memoranda; engaging in settlement negotiations; and drafting dispositive motions. Additionally, since September 2018, I have been a monthly volunteer for Legal Aid at Work's Workers' Rights Clinic.

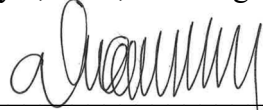
3. Since September 2020, I have worked as an associate at my current firm, Haines Group, APC. I am currently involved with approximately fifty (50) active wage and hour actions, including a number of “hybrid” actions asserting nationwide wage and hour claims

1 under the Fair Labor Standards Act, as well as California-specific claims under Rule 23 of the
2 Federal Rules of Civil Procedure.

3 4. In addition to the above cases, I also play a significant role in many of my firm's
4 current wage and hour class actions. The scope of my involvement includes but is not limited to:
5 corresponding with opposing counsel; attending court hearings; drafting and responding to
6 written discovery; preparing for and defending depositions; drafting long-form settlement
7 agreements; attending mediations; and drafting motions for preliminary and final approval.

8 5. As counsel for Plaintiffs, I have been closely involved in all aspects of this
9 litigation since September 2020. The details of the work completed by my firm in this case are
10 set forth in the declaration of Fletcher W. Schmidt, filed concurrently herewith.

11 I declare under penalty of perjury under the laws of California and the United States that
12 the foregoing is true and correct. Executed on July 8, 2021, at El Segundo, California.

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Alma V. Montenegro